# UBB ExpertEase Prospectus

Public open-ended umbrella fund (the "Umbrella Fund") under Bulgarian law divided in feeder sub-funds (the "Sub-Funds") with a variable number of units opting for investments complying with the conditions of Directive 2009/65/EC - UCITS

This prospectus consists of:

- · Information concerning the Umbrella Fund
- · Information concerning the Sub-Funds

This prospectus (the "**Prospectus**") contains the information necessary for potential investors to make an informed decision on whether to purchase units in the Sub-Funds of the Umbrella Fund. The Prospectus contains information about the risk profile and the investment strategy of each Sub-Fund. Potential investors are advised to familiarize themselves with the information included in the Prospectus prior to making an investment in units in any particular Sub-Fund.

Members of the Board of Directors of management company KBC Asset Management N.V. shall be jointly liable for the damages caused by untrue, misleading or incomplete data in the Prospectus, respectively – for part of the information therein. Person under art. 34, paragraphs 1 and 2 of the Accountancy Act shall be jointly liable with the members of the Board of Directors of the management company for damages caused by untrue, misleading or incomplete data in the financial statements of common fund UBB ExpertEase and the statutory auditor – for damages caused by the audited financial statements.

# I. General information concerning the Umbrella Fund

# A. Introduction of the Umbrella Fund

# **Name**

**UBB** ExpertEase

# **Legal form**

Common (contractual) fund registered with the BULSTAT Register under unified identification code 177477645.

# Date of establishment

The Umbrella Fund and its Sub-Funds are established (organized) in accordance with Bulgaria's Activities of Collective Investment Schemes and Other Undertakings for Collective Investment Act ("ACISOUCIA") and its delegated legislation.

The Umbrella Fund and the Sub-Funds set out in items 1 to 10 in the table in the subsection *List of Sub-Funds* below, information on which is set out in Part II, Sections A. to J. of this Prospectus, have been established (organized) by virtue of decision of KBC Asset Management N.V. ("**KBC AM**" or the "**Management Company**") dated 11.08.2020, decision dated 20.11.2020 for adoption of amended and supplemented prospectus and amended and supplemented rules and other documents of the Umbrella Fund, decision dated 11.01.2021 for adoption of amended and supplemented prospectus and amended and supplemented rules and other documents of the Umbrella Fund, as well as Decision № 87-DF of the Financial Supervision Commission ("FSC") dated 18.02.2021 approving the establishment and management of the Umbrella Fund and these Sub-Funds. The Sub-Funds set out in items 11 to 16 in the table in the subsection *List of Sub-Funds* below, information on which is set out in Part II, sections K. to P. of this Prospectus, are established (organized) based on a decision of the Management Company from 16.11.2021 and decision of the Management Company from 08.02.2022, which adopted and amended and supplemented the version of this Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, as well as Decision № 164-MF from 08.03.2022 of the FSC, approving the organization and management of these Sub-Funds.

The Umbrella Fund and the Sub-Funds set out in items 1 to 10 in the table in the subsection *List of Sub-Funds* below are deemed established in the Republic of Bulgaria on 18.02.2021, and the Sub-Funds listed in items 11 to 16 in the table in the subsection *List of Sub-Funds* below are deemed established in the Republic of Bulgaria on 08.03.2022, which are the dates of their registration in the FSC's register maintained in accordance with article 30 (1), item 4 of the Financial Supervision Commission Act.

# Life

The Umbrella Fund and the Sub-Funds are established for an unlimited period of time.

# **Status**

The Umbrella Fund is an umbrella undertaking for collective investment in transferable securities ("UCITS") established in accordance with ACISOUCIA and consisting of sixteen investment compartments – the Sub-Funds. The Sub-Funds are feeder Sub-Funds within the meaning of article 67 of ACISOUCIA and invest at least 85% of their assets in units of a certain number of investment compartments ("Master Sub-Funds") of Horizon N.V., an open-ended investment company duly incorporated and existing under the laws of Belgium, having its seat and registered office at Havenlaan 2, B-1080, Brussels, Belgium, and managed by KBC AM ("Horizon" or the "Master Umbrella Fund"). For the Master Sub-Funds set out in items 1 to 10 in the table in the subsection *List of Sub-Funds* below there are two feeder Sub-Funds, with units in the one denominated in Euro (EUR), investing in the corresponding Institutional F shares BG class of the respective Master Sub-Fund, denominated in Euro, and in the other denominated in Bulgarian lev (BGN), investing in the corresponding Institutional F shares BG class, denominated in Bulgarian lev, of the respective Master Sub-Fund. For the Master Sub-Funds set out in items 11 to 16 in the table in the subsection *List of Sub-Funds* below, there is only one corresponding Sub-Fund, with units denominated in Bulgarian lev, which invests in the respective Institutional F shares BG class denominated in euro of the respective Master Sub-Fund.

In the relationship between the investors, each Sub-Fund shall be viewed as a separate pool of assets. Investors have rights only with respect to the assets of, and return from, the Sub-Fund in which they have invested. The liabilities of each individual Sub-Fund are covered only by the assets of that Sub-Fund.

# **List of Sub-Funds**

The Sub-Funds of the Umbrella Fund and the respective Master Sub-Funds they feed into are listed in the table below

Sub-Fund Name	Master Sub-Fund name

1.		Horizon KBC Defensive Balanced		
	UBB ExpertEase Defensive Balanced (EUR)	Institutional F share BG class in EUR		
	ISIN BG9000004218	ISIN BE6324083714		
2.	UBB ExpertEase Defensive Balanced (LEVA)	Horizon KBC Defensive Balanced		
	ISIN BG9000003210	Institutional F share BG class in BGN		
		ISIN BE6324084720		
3.	UBB ExpertEase Defensive Tolerant (EUR)	Horizon KBC Defensive Tolerant		
	ISIN BG900005215	Institutional F share BG class in EUR		
	131N BG9000003213	ISIN BE6324087756		
4.	11DD 5 (5 D ( ) T ( ) (4 D ( ) )	Horizon KBC Defensive Tolerant		
	UBB ExpertEase Defensive Tolerant (LEVA)	Institutional F share BG class in BGN		
	ISIN BG9000006213	ISIN BE6324086741		
5.		Horizon KBC Dynamic Balanced		
	UBB ExpertEase Dynamic Balanced (EUR)	Institutional F share BG class in EUR		
	ISIN BG9000008219	ISIN BE6324090784		
6				
6.	UBB ExpertEase Dynamic Balanced (LEVA)	Horizon KBC Dynamic Balanced		
	ISIN BG9000007211	Institutional F share BG class in BGN		
		ISIN BE6324088762		
7.	UBB ExpertEase Dynamic Tolerant (EUR)	Horizon KBC Dynamic Tolerant		
	ISIN BG9000009217	Institutional F share BG class in EUR		
	10114 1500000003217	ISIN BE6324092806		
8.	UBB ExpertEase Dynamic Tolerant (LEVA)	Horizon KBC Dynamic Tolerant		
		Institutional F share BG class in BGN		
	ISIN BG9000010215	ISIN BE6324091790		
9.		Horizon KBC Highly Dynamic Tolerant		
	UBB ExpertEase Highly Dynamic Tolerant (EUR)	Institutional F share BG class in EUR		
	ISIN BG9000012211	ISIN BE6324094828		
10.		Horizon KBC Highly Dynamic Tolerant		
	UBB ExpertEase Highly Dynamic Tolerant (LEVA)	Institutional F share BG class in BGN		
	ISIN BG9000011213	ISIN BE6324093812		
11.		Horizon KBC Defensive Conservative Responsible		
' ' '	UBB ExpertEase Defensive Conservative Responsible	Investing		
	Investing (LEVA)	Institutional F shares BG class in EUR		
	ISIN BG9000006221	ISIN BE6331692176		
12.	UBB ExpertEase Defensive Balanced Responsible	Horizon KBC Defensive Balanced Responsible Investing		
	Investing (LEVA)	Institutional F shares BG class in EUR		
	ISIN BG9000005223	ISIN BE6331693182		
13.	LIDD Eventer on Dynamic Palanced Page 2011	Horizon KBC Dynamic Balanced Responsible Investing		
. 0.	UBB ExpertEase Dynamic Balanced Responsible Investing (LEVA)	Institutional F shares BG class in EUR		
	ISIN BG9000003228	ISIN BE6331694198		
14.		Horizon KBC Defensive Tolerant Responsible		
14.	UBB ExpertEase Defensive Tolerant Responsible	Investing		
	Investing (LEVA)	Institutional F shares BG class in EUR		
	ISIN BG9000004226	ISIN BE6331695203		
15.	UBB ExpertEase Dynamic Tolerant Responsible	Horizon KBC Dynamic Tolerant Responsible Investing		
	Investing (LEVA)	Institutional F shares BG class in EUR		
	ISIN BG9000002220	ISIN BE6331696219		
16.	UBB ExpertEase Highly Dynamic Tolerant Responsible	Horizon KBC Highly Dynamic Tolerant Responsible		
	Investing (LEVA)	Investing		
	ISIN BG9000001222	Institutional F shares BG class in EUR		

	ISIN BE6331698231
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# Conversion

Some of the mentioned Sub-Funds have participated as receiving funds in conversion procedures under the order of ACISOUCIA and the acts on its implementation, as follows:

i) Sub-fund UBB ExpertEase Defensive Balanced (EURO) has participated as a receiving fund in a transformation in accordance with the ACISOUCIA and the acts on its implementation, within which two collective investment schemes, namely DF Raiffeisen (Bulgaria) Active Protection in Euro ("Raifeisen Active Protection in Euro") and DF "Raifeisen (Bulgaria) Global Mix" ("Raifeisen Global Mix"), until the date of the conversion managed by UD "KBC Investment Management" EAD, with UIC 175015558, have contributed to this Sub-Fund. The procedure for this conversion was carried out after receiving permission from the FSC, objectified in Decision No. 21-DF/05.01.2023 and Decision No. 25-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023 year. As a result of the conversion, all assets and liabilities of Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have been acquired and transferred to Sub-Fund UBB ExpertEase Defensive Balanced (EURO), holders of units in Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have acquired units of the Sub-Fund, according to the specified exchange ratios and Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have been terminated, thus the assets of the Sub-Fund also include the assets and liabilities of Raiffeisen Active Protection in Euro and Raiffeisen Global Mix.

ii) Sub-fund UBB ExpertEase Defensive Balanced (LEVA) participated as a receiving fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which DF "Raifeisen (Bulgaria) Active Protection in BGN" ("Raifeisen Active Protection in BGN"), until the date of conversion, managed by UD "KBC Investment Management" EAD, with UIC 175015558, has joined this Subfund. The procedure for this conversion was carried out after receiving permission from the FSC, objectified in Decision No. 22-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of Raiffeisen Active Protection in BGN have been acquired and transferred to Subfund UBB ExpertEase Defensive Balanced (LEVA), holders of units in Raiffeisen Active Protection in BGN has been terminated, thus the assets of the Subfund include the assets and liabilities of Raiffeisen Active Protection in BGN has been terminated, thus the assets of the Subfund include the assets and liabilities of Raiffeisen Active Protection in BGN.

iii) Sub-fund UBB ExpertEase Dynamic Balanced Responsible Investor has participated as a host fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which the DF "Raifeisen (Bulgaria) Global Balanced Fund" ("Raifeisen Global Balanced Fund"), until on the date of the conversion managed by UD "KBC Investment Management" EAD, with UIC 175015558, joined this Subfund. The procedure for this conversion was carried out after receiving permission from the FSC, objectified in Decision No. 23-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of the Raiffeisen Global Balanced Fund have been acquired and transferred to the UBB ExpertEase Dynamic Balanced Responsible Investing Sub-Fund, the holders of units in the Raiffeisen Global Balanced Fund have acquired units of the Sub-Fund in accordance with the specified exchange ratio and the Raiffeisen Global Balanced Fund has been terminated, thus the assets of the Sub-Fund also include the assets and liabilities of the Raiffeisen Global Balanced Fund.

iv) Sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investor has participated as a host fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which the Raiffeisen (Bulgaria) Fund Global Growth Fund ("Raifeisen Fund Global Growth"), until the date of conversion, managed by UD "KBC Investment Management" EAD, with UIC 175015558, has joined this Subfund. The procedure for this conversion was carried out after receiving permission from the FSC, objectified in Decision No. 24-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of the Raiffeisen Fund Global Growth have been acquired and transferred to Subfund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing, the holders of units in the Raiffeisen Fund Global Growth have acquired units of the Subfund, in accordance with the specified exchange ratio and Raiffeisen Fund Global Growth has ceased, thus the assets of the Sub-Fund also include the assets and liabilities of Raiffeisen Global Growth Fund.

# B. Service providers to the Umbrella Fund

# **Management Company**

Information regarding the management company of the Umbrella Fund. Information regarding the Management Company's Bulgarian branch through which the Umbrella Fund will be managed

The Umbrella Fund is managed by KBC Asset Management NV, a limited liability company established under the laws of the Kingdom of Belgium, with seat and registered address in Brussels 1080, Havenlaan 2, registered with the Register of Legal Entities Brussels, identification No. 0469.444.267, through KBC Asset Management – KLON (the "Branch"), a branch of a foreign legal entity, established under the laws of Bulgaria, with seat and registered address in Sofia 1463, Triaditsa district, 89B Vitosha Blvd., Millennium Center, 6th floor, registered with the Bulgarian Commercial Register and the Register of Non – Profit Legal Entities at the Registry Agency with UIC (*EVIK*) 205422541

Date of incorporation of the Management Company. Date of incorporation of the Branch

KBC AM was incorporated on 30 December 1999. The Branch was registered on 4 December 2018.

# Life of the Management Company. Life of the Branch

KBC AM and the Branch are established for an unlimited period of time.

# List of the UCITS for which the Management Company has been appointed

Name	Country of establishment	Identification number (VAT number)
Fivest	Belgium	BE0443669981
Generation Plan	Belgium	BE0725850109
Horizon	Belgium	BE0449441283
IN.flanders Employment Fund	Belgium	BE0472677634
IN.focus	Belgium	BE0469444267
KBC Eco Fund	Belgium	BE0446922055
KBC Equity Fund	Belgium	BE0443681463
KBC Index Fund	Belgium	BE0443670377
KBC Institutional Fund	Belgium	BE0445684118
KBC Master Fund	Belgium	BE0451407811
KBC Multi Interest	Belgium	BE0448688049
KBC Multi Track	Belgium	BE0473012877
KBC Participation	Belgium	BE0877703807
KBC Select Immo	Belgium	BE0454712244
Optimum Fund	Belgium	BE0882423054
Perspective	Belgium	BE0559798678
Plato Institutional Index Fund	Belgium	BE0477637995
Pricos	Belgium	BE0469444267
Pricos Defensive	Belgium	BE0469444267
Pricos SRI	Belgium	BE0469444267
Sivek	Belgium	BE0444662252

# List of the UCITS which are managed by KBC AM through the Branch

Name	Country of establishment	Identification number
UBB Platinum Bulgaria	Republic of Bulgaria	131562537

UBB ExpertEase	Republic of Bulgaria	177477645

# Names and positions of the directors of the management company and of the natural persons to whom the executive management of the management company has been entrusted

The Management Company is managed by a Board of Directors consisting of eleven members. The Board of directors is composed of six non-executive members, including the Chair of the Board of Directors and five non-executive directors, as well as five members with executive functions – managing directors.

The day-to-day management of the activity of the Management Company and the making of strategic decisions are assigned to an Executive Committee composed of the five managing directors of KBC AM. The Executive Committee shall have a chairman elected from among its members. The activity of the Executive Committee is monitored and controlled by the Board of Directors.

The table below contains the names and functions of the members of the Board of Directors of KBC AM.

#### KBC AM:

Name	Title	Mandate
Luc Vanderhaegen	Non-Executive Director, independent member of the Board of Directors	
Katrien Mattelaer	Non-Executive Director	
Axel Roussis	Non-Executive Director	
Stefan Van Riet	Non-Executive Director	
Wouter Vanden Eynde	Non-Executive Director, independent member of the Board of Directors	
Peter Andronov	Chairman of the Board of Directors	
Johan Lema	Managing Director, Chair of the Executive Committee	Natural person to whom the executive management of the management company has been entrusted
Chris Sterckx	Managing Director, member of the Executive Committee	Natural person to whom the executive management of the management company has been entrusted
Frank Van de Vel	Managing Director, member of the Executive Committee	Natural person to whom the executive management of the management company has been entrusted
Klaus Vandewalle	Managing Director, member of the Executive Committee	Natural person to whom the executive management of the management company has been entrusted
Jürgen Verschaeve	Managing Director, member of the Executive Committee	Natural person to whom the executive management of the management company has been entrusted

As of the date of this Prospectus, the main activities performed by the individuals entrusted with the management of KBC AM in other companies are as follows:

Name	Role in the Management Company	Name of the company in which the person carries out significant activity	Country and identification of the Company	Company address	Position held in the Company
Jürgen Verschaeve	Managing director, member of the Executive committee	KBC Fund Management Ltd	IE-450585	Sandwith Street D02 X489 Dublin 2	Director
		IVESAM	BE-0784.325.073	Havenlaan 2 1080 Brussels Belgium	Director

Axel Roussis	Non-Executive Director	Ravago SA	LU19439721	Rue de Merl 76-78 L-2146	Director
Johan Lema	Managing director, Chairman of the Executive committee	IVESAM NV	BE-0784.325.073	Havenlaan 2 1080 Brussels Belgium	Chairman of the Board
		KBC Fund Management Ltd	IE- 450585	Sandwith Street D02 X489 Dublin 2	Chairman of the Board
		CSOB Asset Management, a.s., investicní spolecnost	CZ- 25677888	Radlická 333/150 150 57 Prague 5	Chairman of the Board
		ASSOCIATION BELGE DES ASSET MANAGERS - BELGISCHE VERENIGING VAN ASSET MANAGERS	BE-567779996	Aarlenstraat 82 1040 Brussel	Chairman
		everyoneINVESTED	BE-0745660279	Havenlaan 2 1080 Brussel	Manager
		CBC Banque	BE-0403211380	Avenue Albert 1er 60, 5000 Namur	Director
Katrien Mattelaer	Non-Executive Director	UCO	BE-457983322	Doorniksewijk(Kor) 49 8500 Kortrijk	Manager
		VOBIS FINANCE	BE-428597666	Doorniksewijk(Kor) 49 8500 Kortrijk	Manager
		Bareldam SA	LU-169.943	Avenue de la liberté 25 1931 Luxembourg	Manager
		BELGIAN INTERNATIONAL CARPET CO	BE-426620153	Vlamingstraat 12 8560 Wevelgem	Manager
		Vlerick Investeringsmaatsch appij	BE-0466459439	Doorniksewijk 49 8500 Kortrijk	Manager
		M HKA	BE-0431750859	Leuvenstraat 32 2000 Antwerpen	Indipendent Director
		Pana Ventures	BE-0746856745	Priester Schrursstraat(Kor) 2 Stratenplan 8500 Kortrijk	Manager
Peter Andronov	Chairman of the Board of Directors	"KBC Groep" in het Nederlands, "KBC Groupe" in het Frans, "KBC Group" in het Engels en "KBC Gruppe" in het Duits	BE-403227515	Avenue du Port 2 1080 BRUXELLES - BRUSSEL	Managing Director
		KBC Bank	BE-462920226	Avenue du Port 2 1080 BRUXELLES - BRUSSEL	Managing Director
		KBC Insurance NV	BE-403552563	Professor Roger Van Overstraetenplein 2, 3000 Leuven	Managing Director
		CSOB Poistovna a.s.	SK - 31 325 416	Žižkova 11 Bratislava 811 02	Director
		CSOB Bank	CZ-25677888	Radlicka 333/150, Praha 150 57	Director
		KBC Insurance NV, Irish Branch	IE-296630	Sandwith Street 2 Dublin	Director
		K&H Bank Zrt	HU-10195664-4-44	Vigado ter 1 1051 Budapest	Chairman of board of directors
		K&H Biztosito zrt	HU-0000005	Lechner Ödön fasor 9	Chairman of board of directors

				1095 Budapest	
		KBC Bank Ireland Plc	IE-8F86824G	Sandwich Street 2 Dublin	Director
		United Bulgarian Bank AD	BG-000694959	89B "Vitosha" Blvd. Sofia 1463	Chairman of the supervisory board
		DZI - Life Insurance EAD	BG - 121518328	89B "Vitosha" Blvd. Sofia 1463	Chairman of the supervisory board
		DZI - General Insurance EAD	BG - 121718407	89B "Vitosha" Blvd. Sofia 1463	Chairman of the supervisory board
		KBC Global Services NV	BE - 0772332707	Avenue du Port 2	Member of the management board
		KBC Bank Bulgaria EAD	BG - 831558413	Nikola Vaptzarov Blvd 55	Chairman of the supervisory board
		Ceskoslovenska Obchodná Banka a.s.	SK - 36854140	Michalska 18	Chairman of board of directors
Chris Sterckx	Managing director, member of the Executive committee	BeAMA	BE-0567779996	Koning Albert II-laan 19 1210 Sint-Joost-ten- Node	Member of the Board of Directors
		IVESAM	BE-0784.325.073	Havenlaan 2 1080 Brussels Belgium	Director
Frank Van de Vel	Managing director, member of the Executive committee	Arcade Finance plc	IE-9654908I	Riverside One, Sir John Rogerson's Quay D2 Dublin	Director
		Amethyst Structured Finance plc	IE-9573745G	Riverside One, Sir John Rogerson's Quay D2 Dublin	Director
		Beechwood Structured Finance plc	IE-9573810O	Riverside One, Sir John Rogerson's Quay D2 Dublin	Director
		Brookfields Capital plc	IE-9573753F	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Eperon Finance plc	IE-9573962O	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Espaccio Securities plc	IE-9573762G	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Greenstreet Structured Financial Products plc	IE-9573774N	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
	Nimrod Capital plc	IE-9573422F	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director	
		Opal Financial Products plc	IE-9573778V	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Profile Finance plc	IE-9573439W	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director

		Recolte Securities plc	IE-9573785S	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Silverstate Financial Investments plc	IE-9573430E	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Vespucci Structured Financial Products plc	IE-9573742A	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Vidago Capital plc	IE-9573795V	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Voyce Investments plc	IE-9573420B	4th floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Waterford Capital Investments plc	IE-9573805V	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Waves Financial Investments plc	IE-9573416K	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Vermillion Protective Bond Portfolio Plc	IE-9573958A	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		Ipanema Capital p.l.c.	IE-3409868EH	4th Floor, Hanover Building, Windmill Lane D2 Dublin	Director
		KBC Investment Management EAD	BG-175015558	55 "Nikola Vaptsarov" Blvd., Business Center EXPO 2000 1407 Sofia	Member of the Supervisory board
Stefan Van Riet	Non-Executive Director	Van Bauwel & Co	BE-0404500688	Bisschopstraat 70 2060 Antwerpen	Managing Partner
		De Berk	BE-0891253321	Van Gamerenlei 18 2930 Brasschaat	Manager
Wouter Vanden Eynde	Non-Executive Director	Not applicable	Not applicable	Not applicable	Not applicable
Klaus Vandewalle	Managing director, member of the Executive committee	Not applicable	Not applicable	Not applicable	Not applicable
Luc Vanderhaegen	Non-Executive Director	Not applicable	Not applicable	Not applicable	Not applicable

# Names and positions of the management and other key personnel of the Branch

Katina Peycheva	Branch manager	Natural person to whom the management of the Branch has been entrusted
Patrick van Loij	Deputy branch manager	Natural person to whom the management of the Branch has been entrusted

The Branch manager of the Branch - Mrs. Katina Peycheva is also a Chairperson of the Management Board and

Executive Director of "KBC Investment Management" EAD and a member of the Management Board of the Bulgarian Association of Management Companies and Chairwoman of the Finance and Accounting Committee at the Association.

The Deputy branch manager, Mr. Patrick van Loij does not have any activities outside his duties as a Deputy branch manager of the Branch.

# Identity of the statutory auditor of the Management Company

The statutory auditor of KBC AM is PriceWaterhouseCoopers België, Woluwe Garden, Woluwedal 18, 1932 Sint-Stevens-Woluwe, represented by Gregory Joos, company auditor and recognized auditor.

# Subscribed capital of the Management Company stating the paid-up element

The issued share capital of KBC AM amounts to 35.754.192 Euros. The share capital is fully paid up.

# Remuneration policy

The remuneration policy of the KBC AM staff is based on the KBC Group Remuneration Policy, the general rules laid down regarding the remuneration policy for all staff of KBC Group entities and specific guidelines laid down for staff who could have a material impact on the company's risk profile ('Key Identified Staff'). The KBC Group Remuneration Policy is updated annually.

#### General rules

Each staff member's salary comprises two parts: a fixed component and a variable component. The fixed component is primarily determined by the staff member's position (such as the responsibility they bear and the complexity of their duties). The variable component is dependent on various factors such as the KBC AM results, the results of the staff member's department and the staff member's individual targets. The remuneration policy is also affected by market practices, competitiveness, risk factors, the company's and its shareholders' long-term objectives and developments within the regulatory framework.

#### 'Key Identified Staff'

Special rules apply to 'Key Identified Staff'. The variable salary component for this group of staff is allotted in a manner that promotes appropriate risk management and cannot give rise to the taking of extreme risks. For the updated version of the following information (such as a description of the method for calculating the remuneration and the benefits, and the identity of the persons responsible for allocating the remuneration and the benefits, including the make-up of the remuneration committee, if such a remuneration committee has been established) is available in Bulgarian at the website address <a href="https://www.ubbam.bg/about-us/reports">https://www.ubbam.bg/about-us/reports</a> (Remuneration Policy), and a paper copy can be provided free of charge upon request by an investor and at the Distributor's branches.

# **Distributor**

KBC AM and United Bulgarian Bank AD, which is registered under UIC (*ENK*) 000694959 with the Commercial Register and Register of Non-Profit Legal Entities with the Registry Agency and is fully licensed investment intermediary, which performs investment and ancillary services under applicable legislation (the "**Distributor**") have concluded on 20<sup>th</sup> of November 2020 an addendum to the Distribution Agreement dated 5<sup>th</sup> December 2018 (the Distribution Agreement so amended by the addendum, the "**Distribution Agreement**"), pursuant to which the Distributor has been appointed as a distributor of the Umbrella Fund and its Sub-Funds.

# Principal activities of the Distributor:

According to the Distribution Agreement the Distributor is obliged against remuneration to provide a chain of offices, which to serve as points of sale and to ensure in any other way the distribution of the units in the Umbrella Fund and its Sub-Funds on the territory of Republic of Bulgaria. When performing its duties as a distributor of the Umbrella Fund and its Sub-Funds, the Distributor is authorised to receive purchase orders and redemption orders by the investors and unitholders in the Sub-Funds and to process payments related therewith, to enter into agreements (contracts) with the latter as regards the subscription and redemption of units in the Sub-Funds, to receive complaints, as well as to provide the necessary information regarding the Umbrella Fund and its Sub-Funds, including the Key Information Documents of the relevant Sub-Funds, which the investors and unitholders are entitled to receive according to the legislation in force, the incorporation rules of the Umbrella Fund (the "Umbrella Fund Rules") and this Prospectus. When concluding agreements (contracts) with investors regarding subscription and redemption of units in the Sub-Funds (including when concluding contracts for systematic investment (Systematic Investment Plan - SIP), as specified below in this Prospectus), the Distributor acts in its own name and on behalf of the relevant Sub-Fund.

In addition, the Distributor maintains registers of the unitholders in the Sub - Funds and keeps detail records of the clients' orders as per the applicable legislation.

# Custodian

The Management Company has selected as a custodian (depositary) of the Umbrella Fund and its Sub-Funds (the "Custodian" or "Depositary") United Bulgarian Bank AD, which is registered under UIC (EUK) 000694959 with the Commercial Register and Register of Non-Profit Legal Entities with the Registry Agency. The Custodian has a full banking license granted by Bulgarian National Bank on 19.11.1992 with last amendment of the banking license approved with Order P $\mu$  22 – 2250/ 16.11.2009 r. of Bulgarian National Bank.

#### Contact details of the Custodian

Telephone: +359 2 811 3868; +359 2 811 3750

E-mail: CustodyServicesUBB@ubb.bg

Seat and Headquarters address: 89B Vitosha Blvd, Millennium Center, Triaditsa District, 1463, Sofia, Republic of

Bulgaria

To the attention of: Custody services Unit, Market and Investment Banking Directorate

#### Custodian's activities

According to the Depositary Agreement entered between the Custodian and the Management Company, acting on behalf of the Umbrella Fund and its Sub-Funds (the "**Depositary Agreement**"), and the legislation in force, the Custodian shall act as a custodian and depositary of the Sub-Funds and will keep their assets, including shall:

- (i) Ensure that the issuance, sale, redemption and cancelation of the units in the Sub-Funds are made in accordance with the legislation in force and the rules of the Umbrella Fund.
- (ii) Ensure that the net asset value of the units in the Sub-Funds is calculated in accordance with the legislation in force and the rules of the Umbrella Fund:
- (iii) Make regular reconciliations between the accounts kept with the Management Company and the Custodian for the assets of the Sub-Funds, and, in the cases specified in article 37a of ACISOUCIA, with the accounts kept with the respective sub-custodian:
- (iv) Ensure that the transfers of the funds in favor of the Sub-Funds arising out of transactions with their assets will be made within the customary timeframe and on customary terms;
- (v) Ensure that the income of the Sub-Funds will be distributed in accordance with the legislation in force and the rules of the Umbrella Fund:
- (vi) Report to the Management Company at least monthly for the assets under custody and operations made therewith, including by submitting confirmation to the Management Company on the assets under custody until 5fh day of the next month;
- (vii) Monitor the cash flows of the Sub-Funds, including by checks whether all payments made by investors or on their behalf in relation to the purchase of units in a Sub-Fund, are received and accounted under accounts, which are either opened in the name of the respective Sub-Funds, in the name of the Management Company, acting on its behalf, or in the name of the Custodian, acting on behalf of the Sub-Fund; or are opened with a central bank or another bank (including licensed in the Republic of Bulgaria, in member state of the European Union or in a member state of the European Economic Area or licensed in a third country); and are managed in accordance with the rules, specified in the next item below;
- (viii) Manage the funds of the Sub-Funds, and:
  - Maintain the bank accounts and information about the accounts separately, as to allow for separation of the assets
    of each Sub-Funds from the assets of the other Sub-Funds, as well as the assets of the Sub-Funds from the assets
    of the other clients of the Custodian and from its proprietary assets;
  - · Accurately keep information of the accounts of the Sub-Funds;
  - Undertake the necessary measures to ensure that all funds of the Sub-Funds, which are transferred to a third person
    for safekeeping are kept in individual accounts or in accounts separated from all cash accounts of the person, in
    the name of which the assets of the Sub-Funds are kept. Where cash accounts are opened in the name of a
    custodian, acting on behalf of a Sub-Fund, funds of the respective third person and proprietary funds of the
    custodian may not be transferred to these cash accounts:
  - Introduce proper internal organization and undertake the necessary measures to minimize the risk of loss as a result
    of misuse, fraud, poor management or improper accounting policies, including due to negligence.
  - verifies whether the Management Company or the Branch has adopted and introduced procedures for conducting stress tests for the liquidity of the Sub-funds.
- (ix) Check the fee of the Management Company to be calculated in accordance with the legislation in force and the rules of the Umbrella Fund:

- (x) Assist the Sub-Funds in receiving information regarding the participation at the general meeting of shareholders in the Master Sub-Funds and in other issuers, in which the Sub-Funds have made investments and shall provide other assistance in accordance with the Depositary Agreement and the legislation in force.
- (xi) verify that the Branch of the Management Company has adopted and implemented procedures for conducting stress tests of the fund's liquidity.

The assets of the Sub-Funds are placed in custody with the Custodian as follows:

a) For financial instruments that may be held in custody:

The Custodian will hold in custody all financial instruments that may be registered in a financial instrument account, under financial instrument account with the Custodian, as well as all other financial instruments that can be physically delivered to the Custodian. The Custodian will ensure that all financial instruments that can be registered in a financial instrument account, will be registered under separate financial instruments accounts, opened and maintained by the Custodian in accordance with the rules set forth in item (viii) above in the name of the Management Company, acting on behalf of the respective Sub-Fund, so that it can be clearly ascertained at all times that they belong to the respective Sub-Fund.

b) For other assets:

The Custodian will verify that the respective Sub-Fund is the owner of the assets by checking, based on information or documents provided by the Management Company and, where appropriate, of available external proofs, whether the respective Sub-Fund has ownership. The Custodian will maintain at all times an up-to-date register of the assets for which it has checked whether they are owned by the Umbrella Fund and its Sub-Funds.

The Custodian is not liable for its obligations to its creditors with the assets of the Umbrella Fund.

The Custodian shall act independently and solely to the benefit of all unitholders. In case of loss of any financial instruments kept under custody, the Depositary shall transfer back to the Umbrella Fund the same financial instruments or its monetary equivalent without undue delay. Nonetheless, the Custodian will not be held liable for the loss, if it is able to prove that the loss is due to an occurrence or event beyond its control, which could not have been prevented.

The Custodian shall be liable before the Management Company and the unitholders for any other damages suffered because of negligence or willful misconduct its employees or officers in the performance of the obligations of the Custodian under the applicable legislation.

The delegation of functions according to article 37a of ACISOUCIA to a third person does not exculpate the Custodian from the responsibility specified in this Prospectus and the rules of the Umbrella Fund. The responsibility of the Custodian cannot be excluded or limited by an agreement and any agreement entered into in breach of this rule is null and void.

The unitholders can hold the Custodian responsible either directly or indirectly through the Management Company, unless this will lead to the payment of double indemnification, or to unfair treatment of the unitholders.

# Requirements for the Custodian

The Custodian must comply with all relevant requirements of ACISOUCIA, the secondary legislation on its implementation and the applicable European Union legislation. The Depositary shall not be one and the same person with the Management Company. The Custodian cannot carry out activities for the Umbrella Fund or for the Management Company, acting on its behalf, which may lead to a conflict of interests between the Umbrella Fund, the unitholders, the Management Company and the Custodian, unless there is a functional and hierarchical separation between the functions performed by the Custodian for the Umbrella Fund and the other functions of the Custodian and/or unless the conflict of interests are adequately identified, managed, monitored and disclosed to the investors in the Sub-Funds. See additional details on the conflict of interest rules applied by the Custodian in subsection *Conflict of interest* below.

# Custody tasks delegated by the custodian

The Custodian, having in mind that all or almost all of the assets of the Sub-Funds, except the funds held under bank accounts, will comprise units in the corresponding Master Sub-Funds, has delegated the safekeeping services to KBC Bank NV, a licensed credit institution duly incorporated and existing under the laws of Belgium, having its seat and registered office at Havenlaan 2, B-1080, Brussels, Belgium, as a sub-custodian. The units in the corresponding Master Sub-Funds, which will be owned by the Sub-Funds, are held in 16 separate sub-accounts (per the respective Sub-Funds) in KBC Bank NV.

UNITED BULGARIAN BANK AD has selected KBC Bank NV as a sub-custodian, since the units in the corresponding Master Sub-Funds, which will be owned by the Sub-Funds, are not registered in Clearstream Banking Luxemburg and KBC Bank NV can provide proper safekeeping of these assets and meet all requirements of the European Union and Bulgarian legislation.

#### List of sub-custodians and sub-sub-custodians

#### **KBC Bank NV**

#### Conflicts of interest

Group link as per the meaning of Commission Delegated Regulation (EU) 2016/438 of 17 December 2015 supplementing Directive 2009/65/EC of the European Parliament and of the Council with regard to obligations of depositaries ("**Regulation** (EU) 2016/438") exists between KBC AM, the Custodian and the custodian of the Master Umbrella Fund as all of these companies are part KBC Group, Belgium. Notwithstanding that link conflict of interest has not appeared since:

- KBC AM, the Custodian and the custodian of the Master Umbrella Fund have put in place policies and procedures
  ensuring that: a) they identify all conflicts of interest arising from that link if such conflicts appear; b) take all
  reasonable steps to avoid those conflicts of interest.
- 2. KBC AM and the Custodian ensure that: a) where the management body of the Management Company and the management body of the Custodian are also in charge of the supervisory functions within the respective companies, at least one third of the members or two persons, whichever is lower, on the management body of the Management Company and on the management body of the Custodian shall be independent as per the meaning of art. 24 (2) of Regulation (EU) 2016/438; b) where the management body of the Management Company and the management body of the Custodian are not in charge of the supervisory functions within the respective companies, at least one third of the members or two persons, whichever is lower, on the body in charge of the supervisory functions within the Management Company and within the Custodian shall be independent as per the meaning of art. 24 (2) of Regulation (EU) 2016/438.

In case however such conflict of interest referred potentially appear and cannot be avoided, which is not very likely to happen having in mind the above stated, the Management Company and the Custodian shall manage, monitor and disclose such conflict of interest (if it appears) in order to prevent adverse effects on the interests of the Sub-Funds and of the investors in the Sub-Funds.

## Substitution of the Custodian. Rules for protection of the interests of unitholders

According to ACISOUCIA and the Depositary Agreement the substitution of the Custodian is allowed only after approval by the Deputy Chairperson of the FSC in charge of the Investment Supervision Division. The Depositary Agreement can be terminated and the Custodian substituted:

- a) Upon mutual written consent of the parties to the Depositary Agreement;
- b) Unilaterally by either of the parties with a three-month written notice;
- c) Upon termination of the Umbrella Fund;
- d) Upon withdrawal of the authorization of the Management Company to run the Umbrella Fund;
- e) Upon withdrawal of the license or insolvency of the Custodian;
- f) Upon imposition of a coercive measure on the Custodian;
- g) Upon amendment of the license of the Custodian resulting in a restriction for the Custodian to perform certain activities, which are inherent in the rendering of custody services.

In accordance with the above list, the Depositary Agreement can be terminated by the Management Company, acting on behalf of the Umbrella Fund, with a three-month written notice, and appoint a new custodian of the Umbrella Fund, after the approval of the substitution of the Custodian, granted by the Deputy Chairperson of the FSC in charge of the Investment Supervision Division

The Management Company is required to file with the FSC all necessary documents for obtaining of approval of the substitution of the Custodian as soon as possible after it discovers that the Custodian no longer meets the requirements of ACISOUCIA for a depositary of the Umbrella Fund.

The Depositary Agreement sets out a special procedure, including on the terms and conditions for transfer of the assets of the Umbrella Fund and Sub-Funds to another custodian, in case of substitution of the Custodian and subject to the approval of the Deputy Chairperson of the FSC in charge of the Investment Supervision Division. The transfer of the assets to the new custodian must occur within 5 to 10 days as of the obtaining of the approval for the substitution of the Custodian. The substitution of the Custodian will be made in a way, which guarantees that the custody services will be provided to the Umbrella Fund without interruption.

# Declaration for the provision of updated information upon request

The Management Company, on behalf of the Umbrella Fund, declares that it will provide updated information on the Custodian, its functions, the potential conflicts of interest and the delegated functions by the Custodian to third persons, including the updated list of sub— custodians and sub-sub custodians, upon request by investors or potential investors in units of the Sub-Funds.

Information Sharing Agreement between the Custodian and the custodian of the Master Umbrella Fund

In accordance with the applicable legislation the Custodian and the custodian of the Master Umbrella Fund have entered into an Information Sharing and Irregularities Reporting Agreement (the "Custodian Information Sharing Agreement"). Pursuant to the Custodian Information Sharing Agreement, the custodian of the Master Umbrella Fund and the Custodian undertook to: exchange information and documents which must be shared between the two custodians in accordance with the legislation in force; coordinate their involvement in relation to the procedure for calculating the net asset value of the Sub-Funds and Master Sub-Funds, including any measures appropriate to protect against the activities of market timing, and the processing of instructions on behalf of the Sub-Funds to purchase, subscribe or request the repurchase or redemption of shares in the corresponding Master Sub-Funds, and the settlement of such transactions, including any arrangement to transfer assets in kind; and to coordinate their procedures and share all relevant information deemed necessary for the proper execution of accounting year-end.

In addition, by virtue of the Custodian Information Sharing Agreement the custodian of the Master Umbrella Fund will be obliged to immediately inform the competent regulator of the Master Umbrella Fund, the Umbrella Fund and the Custodian of any irregularities it detects in relation to the Master Umbrella Fund in the course of carrying out its functions and which may have a negative impact on the Sub-Funds, including:

- errors in the net asset value calculation of the Master Sub-Funds:
- errors in transactions for or settlement of the sale, issue, repurchase or redemption of shares in the Master Sub-Funds undertaken on behalf of the Sub-Funds;
- errors in the payment or capitalization of income arising from the Master Sub-Funds, or in the calculation of any related withholding tax;
- breaches of the investment objectives, policy or strategy of the Master Sub-Funds of a nature which would require
  the custodian of the Master Umbrella Fund to notify the breach to its competent regulator or investors in the Master
  Sub-Funds;
- breaches of investment and borrowing limits of the Master Sub-Funds; and
- any regulatory investigation or fines against the Master Umbrella Fund which could impact the Master Sub-Funds and consequently the Sub-Funds.

When providing such notices, the custodian of the Master Umbrella Fund shall also inform the Custodian how the Master Umbrella Fund or its management company has resolved or proposes to resolve the issue.

# Statutory auditor of the Umbrella Fund

The statutory auditor of the Umbrella Fund (the "Auditor") is PRICEWATERHOUSECOOPERS AUDIT OOD, a limited liability company, with seat and registered address at 9-11 Maria Luiza Blvd, Sofia, Bulgaria, registered under UIC (*EUK*) 121499387 with the Commercial Register and Register of Non-Profit Legal Entities with the Registry Agency. The Auditor is registered with the Institute of Certified Public Accountants under registration No 085.

# Principal activities of the statutory auditor

The Auditor checks whether the financial statements of the Umbrella Fund are a true and fair presentation of the financial situation of the Umbrella Fund and its Sub-Funds and whether the annual report is in line with the financial statements.

The Auditor is obliged to inform the FSC without undue delay for any circumstances and decisions in relation to the Umbrella Fund, which it finds out during the audit of the financial statements of the Umbrella Fund, which may lead to:

- Significant breach of the applicable legislation for the Umbrella Fund;
- Risk for the continuous operation of the Umbrella Fund;
- A refusal to certify the financial statements or the expression of reservations.

The Auditor has entered into an Information Sharing Agreement with the auditor of the Master Umbrella Fund, pursuant to which *inter alia* rules for exchange of information between the two auditors have been set in relation to the terms and conditions for provision of the audit report of the auditor of the Master Umbrella Fund and information about irregularities found in the auditor report of the auditor of the Master Umbrella Fund to the Auditor.

Based on the provided information, the Auditor considers in its audit report in relation to the financial statements of the Umbrella Fund the audit report of the auditor of the Master Umbrella Fund, as well as includes in its report information about irregularities found in the auditor report of the auditor of the Master Umbrella Fund and their impact on the activity of the Umbrella Fund.

# C. Corporate information

# Assets of the Umbrella Fund and the Sub-Funds

The net asset value of each of the Sub-Funds of the Umbrella Fund shall be at least BGN 500,000 (or the equivalent in Euro, as applicable for the EUR Sub-Funds, as defined below).

This minimum amount shall be reached within two years of KBC AM obtaining an approval for establishment and management of the Umbrella Fund, respectfully for the specific Sub-Fund, and shall be maintained at all times thereafter. If the net asset value of a Sub-Fund fails to reach BGN 500,000 (or the equivalent in Euro, as applicable for the EUR Sub-Funds, as defined below) within this period or for 6 consecutive months the average monthly net asset value of such Sub-Fund falls thereafter below BGN 500,000 (or the equivalent in Euro, as applicable for the EUR Sub-Funds, as defined below), KBC AM shall, within 10 business days, disclose the reasons for this, the measures it will take to attract new investments, and the deadline within which these measures will be implemented and within which the affected Sub-Fund is expected to recover the minimum amount of its net asset value. The abovementioned period of 10 business days shall start running from the expiry of the initial two-year period, respectively from the expiry of 6 consecutive months referred to in the preceding sentence.

The disclosure shall be made on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the website of the Branch under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) as well as by way of other appropriate means in view of the established means of communicating information to investors. The Branch shall submit to the FSC a copy of the information by the end of the business day following the day of its disclosure, and information regarding the results of the measures undertaken by the 10th day of each month until the minimum amount of BGN 500.000 is reached.

The Umbrella Fund's assets increase or decrease according to the change in the net asset value of each of the Sub-Funds, including as a result of the issuance and redemption of units in each of the Sub-Funds and of the fluctuations in the net asset value of the Sub-Funds' investments in their corresponding Master Sub-Funds.

KBC AM separates its assets from the assets of the Umbrella Fund and compiles a separate balance sheet for the Umbrella Fund and its Sub-Funds. The custodian bank of the Umbrella Fund maintains records and accounts for the cash and other assets of each of the Sub-Funds which are separate from its own assets.

# **Balance sheet date**

The financial year of the Umbrella Fund coincides with the calendar year and ends on 31 December.

The Branch submits to the FSC and the public:

- an annual audited financial report of the Umbrella Fund and its Sub-Funds within 90 days of the end of the financial year, prepared in accordance with the requirements of the International Financial Reporting Standards (IFRS).
- a semi-annual financial report for the first 6 months of the financial year, within 30 days of the end of the reporting period.

The Branch submits to the FSC by the 10th day of the month following the reporting period monthly balance and information on the volume and structure of the investments in the portfolio of each Sub-Fund by issuers and types of securities and other financial instruments. This information is not made public and serves only supervisory purposes of the FSC.

By the 10th day of each month, the Branch publishes on its website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and the Distributor publishes on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) summarised information on:

- the structure of portfolio of each Sub-Fund as of the last date of the previous month, which contains at least data on the percentage of each Sub-Fund's assets invested in financial instruments and/or cash;
- the types of derivative instruments used, the main risks connected with the underlying assets of the derivative instruments, the quantitative restrictions and applied methods for risk assessment connected with the derivative instruments.

# Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds

#### Characteristics of the units in the Umbrella Fund and Sub-Funds

The Umbrella Fund is divided in sixteen Sub-Funds. Pursuant to § 1, item 4 of the Additional Provisions to the ACISOUCIA the units issued by each Sub-Fund are financial instruments, which incorporate the rights of their holders

over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria. In the relationship among investors, each Sub-Fund shall be viewed as a separate pool of assets. Investors have rights only with respect to the assets of, and return from, the Sub-Fund in which they have invested. The liabilities of each Sub-Fund are covered only by the assets of that Sub-Fund.

The units in Sub-Funds UBB ExpertEase Defensive Balanced (LEVA); UBB ExpertEase Defensive Tolerant (LEVA); UBB ExpertEase Dynamic Tolerant (LEVA); UBB ExpertEase Highly Dynamic Tolerant (LEVA); UBB ExpertEase Defensive Conservative Responsible Investing; UBB ExpertEase Defensive Balanced Responsible Investing; UBB ExpertEase Dynamic Balanced Responsible Investing; UBB ExpertEase Defensive Tolerant Responsible Investing; UBB ExpertEase Dynamic Tolerant Responsible Investing and UBB ExpertEase Highly Dynamic Tolerant Responsible Investing are denominated in Bulgarian leva (BGN) (the "LEVA Sub-Funds") and have a nominal value of BGN 10 each.

The units in Sub-Funds UBB ExpertEase Defensive Balanced (EUR); UBB ExpertEase Defensive Tolerant (EUR); UBB ExpertEase Dynamic Balanced (EUR); UBB ExpertEase Dynamic Tolerant (EUR); and UBB ExpertEase Highly Dynamic Tolerant (EUR) are denominated in Euro (EUR) (the "EUR Sub-Funds") and have a nominal value of EUR 10 each.

The number of units issued by each Sub-Fund is not limited and can fluctuate depending on the issuance of new units and the redemption of existing units. Each Sub-Fund can issue whole and partial units.

# Subscription of units. Contributions

Other than within the Initial Subscription Period, as specified below, the units are issued on the basis of the net asset value ("NAV") of the respective Sub-Fund and are subscribed against a cash contribution of each investor in a certain amount (the investment amount). The number of units that each investor acquires is determined by the investment amount of each investor divided by the issue price per one unit in a Sub-Fund, calculated for the respective day. If the investment amount does not allow the subscription of a round number of units, the investor can also acquire a fraction of a unit in which case the fraction of a unit would be cut to the fourth decimal place.

Investors can subscribe units in Sub-Funds only against contributions in cash. The minimum subscription amount for units in LEVA Sub-Funds is BGN 10 and for EUR Sub-Funds – EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit in the respective Sub-Fund. The Sub-Funds may issue only units or fractions of units the issue price of which has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

The secondary transfer of units issued by a Sub-Fund and held by individuals and legal entities shall follow the terms and conditions of the applicable legislation. Sale and purchase transactions shall be entered into and/or settled through licensed investment firms. The transfer of units issued by a Sub-Fund by way of donation and inheritance shall be carried out through a licensed investment firm operating as a registration agent. Such transfers shall have effect following their registration to the transferee's account/sub-account maintained in Central Depository AD.

# Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

Investors can find more information on the units issued by each Sub-Fund in Part II *Information concerning the Sub-Funds* of this Prospectus.

# Rights provided by the units in the Sub-Funds

The units in each individual Sub-Fund of the Umbrella Fund give their owners equal rights to the rights of the other unitholders in that Sub-Fund, proportional to the number of units held. Each such unit provides its holder with the right to a respective portion of the assets of an individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

All units in the Sub-Funds of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor to participate in meetings of the investors. No such meetings take place.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

# Right to liquidation proceeds

Each holder of units in a Sub-Fund of the Umbrella Fund is entitled to a part of the assets of the respective Sub-Fund, which corresponds to the units held thereby, upon liquidation of that Sub-Fund and/or the Umbrella Fund. This right may be exercised insofar as after the satisfaction of all creditors of the respective Sub-Fund, there are assets left for distribution. Where the assets of a Sub-Fund, which remain after repayment of all obligations to the creditors of that Sub-Fund, are insufficient to repay the subscription price paid by any given unitholder, the latter will sustain a loss on her or his investment.

# Redemption right

Each unitholder in a Sub-Fund has the right to request that her or his units are redeemed by KBC AM to the benefit of the respective Sub-Fund unless the redemption is suspended in accordance with this Prospectus and the Umbrella Fund Rules. The redemption request may relate to part or all of the units held by the investor.

The redemption right cannot be exercised by an investor in part, but only in full, if a partial redemption would result in the investor holding less than one full unit in a Sub-Fund.

# Information right

Each unitholder in a Sub-Fund of the Umbrella Fund has the right to receive the public information contained in this Prospectus, the Umbrella Fund Rules, the Key Information Documents of each Sub-Fund, the latest annual and semi-annual financial statements of the Umbrella Fund, as well as information on KBC AM and the Branch and the prospectus and the latest annual and semi-annual financial statements of the Master Umbrella Fund (in the latter case, only in the English language).

A Key Information Document shall be provided to each potential investor in a Sub-Fund of the Umbrella Fund free of charge and within a reasonable timeframe before such investor subscribes units in such Sub-Fund.

The Prospectus and the latest published annual and semi-annual financial statements of the Umbrella Fund and the prospectus and the latest annual and semi-annual financial statements of the Master Umbrella Fund (in the latter case, only in the English language) shall be provided free of charge to any investor who wishes to familiarize themself with their contents, with a view of making an investment decision. Further information can be found in the section *Places where additional information regarding the Umbrella Fund and the Master Umbrella Fund can be obtained* below in this section

# Right to lodge a complaint

Investors have the right to file complaints free of charge against actions and omissions of KBC AM, the Branch and their third party service providers, including with regard to the unit administration activities (including legal and accounting services related to asset management), investor information requests, net asset valuation and unit price calculation, compliance with legal requirements, keeping a book of unit holders, distribution of payments, issuance, sale and redemption of units, performance of contracts, record keeping, etc. Upon request, investors shall be provided with free information on the terms and conditions for lodging and addressing complaints.

Investors can find further information on the procedure for filing complaints in subsection *Information on the filing of complaints* of section *Additional Information* of this Prospectus and on the website of the Branch, for Bulgarian language: UBB Asset Management (ubbam.bg) in the section Basic documents/ Procedure for submitting and handling complaints from the holders of units of collective investment schemes managed by KBC Asset Management N.V. and for English language: UBB Asset Management (ubbam.bg) Basic documents/ Procedure for submitting and handling of complaints.

# Registration of the units in the Umbrella Fund and Sub-Funds

Upon subscription, the units of a unitholder in a Sub-Fund of the Umbrella Fund are registered to a client sub-account opened with the account (register) of the Distributor in Central Depository AD. Investors may transfer their units in Sub-Funds of the Umbrella Fund from one custodian to another in accordance with the applicable law. Investors can find further information on the procedure for redemption of units in a Sub-Fund and the transfer of investment between different Sub-Funds of the Umbrella Fund in section *Rules for issuance, marketing and redemption of the units in the Umbrella Fund and Sub-Funds* of this Prospectus.

### Liquidation of the Umbrella Fund or a Sub-Fund. Liquidation procedure

The Umbrella Fund, respectively one or more of its Sub-Funds shall be liquidated:

by resolution of the competent corporate body of KBC AM;

- upon revocation of the authorization of KBC AM for organization and management of the Umbrella Fund or one or more of its Sub-Funds;
- when within three months after the revocation of the license, winding-up or declaration of insolvency of KBC AM no new management company has been chosen to manage the Umbrella Fund or one or more of its Sub-Funds and/or such funds have not been merged with or into another UCITS or an investment compartment thereof;
- in the case of liquidation of the Master Umbrella Fund or one or more of its Master Sub-Funds, unless the FSC
  approves investment of at least 85% of the assets of the Umbrella Fund/Sub Fund in the units of another master
  UCITS or the amendment of the Umbrella Fund Rules in order to enable the Umbrella Fund/Sub Fund to convert
  into a UCITS/sub-fund of UCITS which is not a feeder fund/sub-fund:
- In the case of transformation of the Master Umbrella Fund or one or more of its Master Sub-Funds, unless the FSC issues one of the following approvals to the Umbrella Fund/Sub-Funds:
  - to continue to be a feeder UCITS/feeder sub-fund of the Master Umbrella Fund/Master Sub-Fund or another UCITS resulting from the transformation of the Master Umbrella Fund/Master Sub-Fund;
  - to invest at least 85% of its/their assets in units of another master UCITS not resulting from the transformation:
  - to amend the Umbrella Fund Rules in order to convert into UCITS/sub-fund of UCITS, which is not a feeder fund/sub-fund:
- in the cases and in accordance with art. 363, lit. "a" and "b" of the Law on Obligations and Contracts

Within 14 days of occurrence of ground for liquidation of the Umbrella Fund or one or more of its Sub-Funds, KBC AM shall file with the FSC an application for approval of the respective fund's liquidation. The liquidation of the Umbrella Fund and/or its Sub Funds shall be governed by Ordinance No 44 dated 20.10.2011 on the requirements for the activity of collective investment schemes, management companies, national investment funds, alternative investment funds and persons managing and alternative investment funds ("Ordinance No 44") and the other applicable legislation.

Upon termination of the Umbrella Fund and/or its Sub-Fund the following provisions of the Commercial Act ("CA") shall apply *mutatis mutandis* with regard to the obligations of the liquidator and the protection of the fund's creditors – article 267, article 268 (1) and (3), article 270, article 271 and article 273 of the CA, where the functions of a governing body pursuant to article 270 (2) and article 272 (4) of the CA shall be fulfilled by KBC AM. Until the redemption of units is temporarily suspended, the unitholders can offer their units for redemption by the Umbrella Fund (further information on the applicable redemption process can be found in section *Rules for issuance, marketing and redemption of the units in the Umbrella Fund and Sub-Funds* of this Prospectus; further information on the suspension of redemption can be found in section *Suspension of the redemption of units in the Umbrella Fund and Sub-Funds* of this Prospectus). Furthermore, unitholders have the right to a share in the liquidation proceeds from the liquidation of the Umbrella Fund and/or its Sub-Fund (further information on the rights attached to the units of Sub-Funds of the Umbrella Funds can be found in section *Rights provided by the units in the Sub-Funds* of this Prospectus).

#### Transformation (merger) of the Umbrella Fund or a Sub-Fund. Transformation procedure

Upon a decision of KBC AM, the Umbrella Fund or one or more of its Sub-Funds may be transformed by way of merger with or into another UCITS or an investment compartment thereof, including another Sub-Fund, subject to approval of the merger by the Financial Supervision Commission. Such merger can take place both with UCITS based in Bulgaria, as well as on a cross-border basis with UCITS from another European Economic Area state in accordance with the requirement of ACISOUCIA and Ordinance No 44.

A merger can be affected only after its approval by the FSC and the publication of a merger notification to the unitholders, containing detailed information on the merger background, process and effects for the unitholders and their investment in the Umbrella Fund and its Sub-Funds.

After being notified of a planned merger of the Umbrella Fund or its Sub-Fund thereof with or into another UCITS, unitholders shall have no less than 30 days to request the redemption of their units or, where possible, exchange of their units with units of another Sub-Fund or collective investment scheme with similar investment objectives, managed by KBC AM or by another management company to whom KBC AM is closely related, without owing any fees other than the fees required to cover the costs for early termination of investments, in order to release funds to meet the unitholder's requests for redemption or exchange of units.

Once the merger takes effect, the merging Umbrella Fund or Sub-Fund shall be dissolved without liquidation and shall transfer all its assets and liabilities to a receiving – existing or newly established – fund or sub-fund in exchange of units of the receiving entity issued to the remaining unitholders of the Umbrella Fund or Sub-Fund. The exchange of units shall be executed based on a precalculated exchange ratio and – where applicable – may include the payment of a cash amount not exceeding 10% of the value of the units provided to the unitholders of the Umbrella Fund or Sub-Fund.

In accordance with the applicable law and following a respective decision by KBC AM, the Umbrella Fund or its Sub-Funds may also take part in a – domestic or cross-border – merger as the receiving entity, subject to approval by the FSC and/or the competent authorities supervising other UCITSs taking part in the merger. It should be taken into account that some of the Sub-Funds participated in conversion procedures as receiving funds, as a result of which certain collective investment schemes managed before the implementation of the conversion procedures by UD "KBC

Investment Management" EAD, with UIC 175015558, have merged into the respective Sub-Funds. More information regarding the conversion procedures is contained in the Conversion section of Section A. Description of the Umbrella Fund above in this Prospectus.

# Listing on a regulated market or another organized marketplace

The units in the Sub-Funds of the Umbrella Fund are not admitted to trading and are not traded on a regulated market or another organized marketplace within the European Economic Area or in a third country. As at the date of this Prospectus there are no plans for submitting an application for their admission to trading on such venues.

# Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds

The management of the Umbrella Fund and the Sub-Funds, including the control over the general organization of issuing (selling) and redeeming units in the Sub-Funds is carried out by KBC AM through the Branch. KBC AM acting through the Branch, organizes the activity on issuance (sale) and redemption of the units at the expense of the respective Sub-Fund by entrusting the sale and redemption of units of the Sub - Funds to the Distributor and its network of offices where orders for subscription and redemption of units are accepted and contact is made with investors and unit-holders. In this regard, the Distribution Agreement with the Distributor is in place (see additional information on the duties of the Distributor as a distributor of the units in the Sub-Funds in section "Distributor" above).

The purchase and redemption orders of units in the Sub-Funds are accepted by employees of the Distributor every business day (namely day T) within the working hours with clients of the Distributor.

Orders placed by 17:00 on day T are executed at an issue/redemption price valid for that day, which is calculated on the next business day (being day T+1).

The purchase and redemption orders of units in the Sub-Funds submitted after 17:00 on day T are executed at the issue/redemption price valid for the next business day (namely day T + 1), which is determined on the following business day thereafter (namely day T + 2).

# Rules for issuance (sale) of units

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained in the following manners:

- in person, at the place of submitting the order without paying additional costs;
- by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper.
- On mobile device, by using the Distributor's app on Android and iOS (ОББ Мобайл) for orders executed using the Distributor's app for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan SIP).

The payment of the purchased units is made by a wire transfer, for which purpose the following actions are performed:

## Submission of an order in a branch of the Distributor

When submitting a purchase order for units in a Sub-Fund (namely day T) in a Distributor's branch (office) within the working hours with clients of the Distributor, if the investor does not have a current account in the bank, such should be opened for him. Otherwise, purchase orders through a Distributor's branch cannot be submitted.

Potential investors in units of the Sub-Funds should keep in mind that subscription orders and redemption orders in relation to units in the Sub-Funds may only be filed with the Distributor, and KBC AM, operating through the Branch, does not offer another channel for subscription and redemption of units in the Sub-Funds. Therefore, potential investors in units in the Sub-Funds should have in all cases an open current account with the Distributor to be able to place orders for subscription of units in the Sub-Funds.

On this account the investor can deposit and withdraw money at any time, from any office of the Distributor, including making payments with it. The investor is obliged to ensure cash on his account, sufficient to fulfil the order. The collected amounts (by issue value) are accumulated in a special account opened with the Distributor, from which they are transferred on the same or the next business day at the latest to the respective account of the Sub-Fund in the Depository, as the investors owe respective fees according to Distributor's Tariff (if any).

The request for this can be made personally by the investor or by a person authorized by him (respectively his legal representative).

At the time of submission of the order (day "T"), the funds required to pay for the issue value of the subscribed units and the bank fees of the Distributor (if any), the specified account is blocked in favour of the Sub-Fund until the execution of the order (respectively concluding a transaction). The order is executed, up to the blocked amount on the account, taking into account the bank fees due to the Distributor (if any), except when the submitted order is below the minimum amount of investment.

The investor can submit an order for cancellation until 17:00 on the same business day (i.e. day "T"), after which the purchase order becomes irrevocable according to the current legislation. For orders placed after 17:00 on day "T", cancellation orders are accepted until 17:00 on the next working day (day "T + 1"). Then, the order for subscription of units shall be considered irrevocable.

After determining the issue value for a unit of a Sub-Fund, the account of the investor who placed an order for subscription (if the order is submitted in the office of the Distributor), is bound by the amount requested in the order amount, which is divided by the price determined for one unit of this Sub-Fund. If against the imported amount can not be issued an integer number of units, the investor acquires a partial share, such as the number purchased shares is determined to the fourth decimal place. If the investor has stated in the contract that he wishes to acquire an integer number of units, there may be a balance of the amount paid, which is refunds within 3 days from the date of execution of the order to the account of the investor.

When placing an order for subscription of units, the investor may limit the number of units he wishes to acquire. In case the requested / transferred amount allows for the acquisition of a larger number of units from the one specified in the restriction, the order is executed up to the amount of the restriction and the order for refunds.

The investor can deposit and withdraw money from the opened account at any time, from any branch of the bank, including using it for any payments. The investor is obliged to ensure that he has sufficient funds in his account for the execution of the order. The collected funds (at issue price) are accumulated in a special account, opened at the Distributor, from which on the same or at the latest on the next business day they are transferred to the respective Sub-Fund's account at the Custodian.

In case of absence, confusion or contradiction between the requisites of the order and / or necessary applications to it or non-compliance with the necessary conditions for the purchase of units in the Sub-Fund, the subscription order is considered for invalid and not running.

The minimum amount of the investment for acquisition of units in the Sub-Fund in BGN is 10 (ten leva), divided of the issue value of one unit. The investor receives confirmation of the transaction as soon as possible, but not later than the end of the first working day following the execution of the contract.

Except when concluding a Systematic Investment Agreement (Systematic Investment Plan - SIP) (please see the following subsection for more details), investors can only place orders in offices of the Distributor.

# Systematic investment plans

The Distributor concludes with the investors (natural persons) also an Agreement for Systematic Investment (Systematic Investment Plan - SIP) (a "SIP Agreement"), pursuant to which orders for subscription of units issued by a Sub-Fund are periodically executed on dates selected by the respective investor. When concluding a SIP Agreement, the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. For example, the investor chooses to make a cash contribution to a Sub-Fund on a monthly basis on the 25th. The investor may also choose different accounts, from which the cash contribution is collected.

Upon concluding a SIP Agreement, the investor shall be obliged to have at least one current account opened with the Distributor and the funds required for the chosen investment, on the date(s) specified in the SIP Agreement and the required funds to be on his account/s until the execution of the order. The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order(s) under a SIP Agreement is automatically generated on the investment day (s) specified by the investor, whereby the order (s) is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order(s) is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account/s on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл). For this purpose, the investor must have previously concluded an Agreement for electronic banking services with the Distributor. By executing the respective SIP Agreement through the app of the Distributor, the investor grants its consent the current account/s indicated by him to be debited up to the amount required for the execution of the orders under the executed SIP Agreement.

The minimum amount of the investment when purchasing units of a LEVA Sub-Fund, for the orders executed based on a SIP Agreement is in the amount of BGN 10 (ten leva). The minimum amount of the investment when purchasing units of a EUR Sub-Fund, for the orders executed based on a SIP Agreement is in the amount of EUR 10 (ten euros).

Necessary documents submitted by the investor when submitting an order for units of a Sub-Fund. Identification. Representation.

The identification of the investor is performed under the conditions for registration and identification of investors in accordance with the internal regulations governing the identification and verification of the identity of the investor and the General Terms and Conditions for Payment Services of the Distributor – UBB (the "General Terms and Conditions"). The General Terms and Conditions can be found on the website of UBB - <a href="www.ubb.bg">www.ubb.bg</a>, in the section "Tariffs and General Terms and Conditions".

# **Initial Subscription**

Initial subscription procedure for the Sub-Funds set out in items 1 to 10 in the table in the subsection "List of Sub-Funds" (for the purposes of this subsection, "Sub-Funds")

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Funds, KBC AM through the Distributor will commence an initial subscription procedure (the "Initial Subscription") for subscription of units in the Sub-Funds. Within the Initial Subscription the units in the Sub-Funds will be offered for subscription at their nominal value(the "Initial Subscription Price"), i.e. BGN 10 for the LEVA Sub-Funds and EUR 10 for the EUR Sub-Funds. During the Initial Subscription, considering that the Umbrella Funds and the Sub-Funds are still not operational, no NAV, issue price and redemption price of the units in the Sub-Funds will be determined and published.

The Initial Subscription will commence at 9.30 Bulgarian time on the day (the "Initial Subscription Start Date") specified in the Initial Subscription Notice, as defined below, which will not be earlier than the first busines day after expiration of seven days after the publication of the Initial Subscription Notice, and will finish at 17.30 Bulgarian time on the first business day after expiration of two months (in which the Initial Subscription Start Date is included) following the Initial Subscription Start Date (the "Initial Subscription End Date"). All investors may express non-binding interest for subscription of units in the selected Sub-Fund/s from the Initial Subscription Start Date until the Initial Subscription End Date (the "Initial Subscription Period").

The Initial Subscription will be publicly announced by an initial subscription public notice (the "Initial Subscription Notice"), which will be published on the website of the Branch (<a href="www.ubb.bg">www.ubb.bg</a>) and on the website of the Distributor (<a href="www.ubb.bg">www.ubb.bg</a>) at least seven days prior to the Initial Subscription Start Date. The Initial Subscription Notice will contain the necessary information for the Initial Subscription, including as regard the Initial Subscription Period and the formalities which need to be complied with by the prospective investors to subscribe units in the selected Sub-Fund/s and to pay their Initial Subscription Price. Along with the Initial Subscription Notice this Prospectus will be also published on the abovementioned websites of the Branch and the Distributor.

Investors will need to sign the necessary agreements, to place a non-binding expression of interest to subscribe units in the selected Sub-Fund/s with the Distributor and to present the necessary identification documents, as specified in the remaining subsections of this section.

During the Initial Subscription Period no other subscription orders regarding units in the Sub-Funds are accepted.

The Initial Subscription Price must be paid on the first business day following the Initial Subscription End Date (until 17.30 Bulgarian time) (the "Initial Subscription Price Payment Deadline") to a special bank account opened in the name of the selected Sub-Fund with the Custodian, which will be designated in the Initial Subscription Notice.

Investors who placed non-binding expressions of interest to subscribe units in the selected Sub-Fund/s will have the right to withdraw their non-binding expressions of interest until the expiration of the Initial Subscription Period at no cost for the investor.

At 17.30 Bulgarian time on the Initial Subscription End Date, the placed non-binding expressions of interest to subscribe units in the selected Sub-Fund/s, if not withdrawn, will be deemed subscription orders in relation to the units in the Sub-Fund/s designated therein, and the investors must pay the Initial Subscription Price of the subscribed units in the Sub-Fund/s until the Initial Subscription Price Payment Deadline.

All placed subscription orders, in relation to which the Initial Subscription Price of the subscribed units in the Sub-Fund/s is paid until the Initial Subscription Price Payment Deadline, will be filled by KBC AM on the following business day after the occurrence of the Initial Subscription Price Payment Deadline, the units in the selected Sub-Funds will be deemed subscribed by the respective investors, and the units in the Sub-Funds will be issued in the name of the relevant investors. After the subscription orders have been executed, and after the issuance of the units in the Sub-Funds in the name of the relevant investors, the Initial Subscription Price paid by such investors will be available for investments by the Sub-Funds in accordance with their investment policies.

The Initial Subscription will be considered successful, in respect of the relevant Sub-Fund, if non-binding expressions of interest have been submitted for subscription of units in this Sub-Fund amounting to at least EUR 100 000 (one hundred thousand euros), for the EUR Sub-Funds or BGN 200,000 (two hundred thousand leva), for the LEVA Sub-Funds, and the Initial Subscription will be considered successful for all Sub-Funds (i.e. for the entire Umbrella Fund) if non-binding expressions of interest of at least EUR 10,000 000 are submitted (ten million euros) in all Sub-Funds, where in respect of the LEVA Sub-Funds the euro equivalent of the funds to be invested will be taken into account, according to the submitted non-binding expressions of interest, according to the official exchange rate of the Bulgarian National Bank.

If the Initial Subscription is unsuccessful, according to the criteria set out in the previous paragraph, KBC AM may decide not to proceed with the commercialization of the respective Sub-Fund/s and reject all non – binding expressions of interest made by investors at no cost for such investors. This decision will be publicly announced by a notice published on the website of the Branch (<a href="www.ubbam.bg">www.ubbam.bg</a>) and on the website of the Distributor (<a href="www.ubb.bg">www.ubb.bg</a>, and appropriate adjustments will be made to this Prospectus and rules and other documents of the Umbrella Fund.

In addition, KBC AM will be entitled to extend the Initial Subscription Period with no more than twenty business days before the Initial Subscription End Date. In this case KBC AM will notify the FSC, the Distributor and the Custodian for the extension of the Initial Subscription Period and will publish a notice for the extension on the web site of the Branch and the web site of the Distributor, specified above.

After expiration of the Initial Subscription Period the issuance and redemption of units in the Sub-Funds will be carried out in accordance with the rules specified in the remaining subsections of this section.

Initial subscription procedure for the Sub-Funds set out in items 11 to 16 in the table in the subsection "List of Sub-Funds" (for the purposes of this subsection, "New Sub-Funds")

After receiving authorization from the FSC to organize and manage the New Sub-Funds, KBC AM through the Distributor will start Initial subscription of units of the New Sub-Funds. Within this Initial Subscription, the units of the New Sub-Funds will be offered for subscription at a Price of initial subscription equal to their nominal value, i.e. BGN 10. Within this Initial Subscription, the NAV, the issue value and the redemption price of the units of the New Sub-Funds will not be calculated and published.

The Initial Subscription will start at 9:30. Bulgarian time on Date of the Initial Subscription, specified in the Notice of Initial Subscription, but not earlier than the first working day after the expiration of seven days after the publication of the Notice of Initial Subscription, and will end at 17.00. Bulgarian time on the end Date of the Initial Subscription, representing the first working day after the expiration of two months (which includes the start Date of the Initial Subscription) after the start Date of the Initial Subscription. All investors can submit a non-binding application for interest in subscribing units in the selected New Sub-Fund(s) during the Initial Subscription Period, i.e. from the Initial Subscription Start Date to the Initial Subscription End Date.

The Initial Subscription will be made public through an Initial Subscription Notice, which will be published on the Branch's website (<a href="www.ubbam.bg">www.ubbam.bg</a>) and on the Distributor's website (<a href="www.ubb.bg">www.ubb.bg</a>) at least seven days before the Date of the start of the Initial Subscription. The Initial Subscription Notice will contain the necessary information for this Initial Subscription, regarding the Initial Subscription Period and the necessary requirements for the potential investors to subscribe for units in the selected New Sub-Fund(s) and to pay their price for Initial Subscription. This amended Prospectus will also be published together with the Notice of Initial Subscription to the Branch and Distributor websites.

Investors will need to sign the necessary contracts, submit a non-binding application for interest in subscribing units in a selected New Sub-Fund(s) to the Distributor and provide the necessary identification documents as specified in the other subsections of this section.

No other orders to subscribe for units in the New Sub-Funds shall be accepted during the Initial Subscription Period.

The price for Initial Subscription should be paid by the Deadline for payment of the price upon Initial Subscription i.e., until 17:00 Bulgarian time on the first business day following the end Date of the Initial Subscription, which will be specified in the Initial Subscription Notice as the investor is obliged to provide on his bank account with the distributor "United Bulgarian Bank" AD the necessary funds for the desired investment.

Investors who have submitted non-binding applications for interest in subscribing units in a selected New Sub-Fund(s) will have the right to withdraw them until the end of the Initial Subscription Period, at no cost to the investor.

At 17.00 Bulgarian time on the end Date of the Initial Subscription, the submitted non-binding expressions of interest for subscription of units in the selected New Sub-Fund(s), if not withdrawn, will be considered as subscription orders regarding the units in the New Sub-Fund(s) specified in them and investors will have to pay the Price upon initial subscription regarding the units subscribed in the New Sub-Fund(s) until the Deadline for payment of the price upon initial subscription.

All submitted subscription orders, in which the Price for initial subscription in connection with the subscribed units in the New Sub-Fund(s) has been paid until the Deadline for payment of the initial subscription price, will be satisfied by KBC AM on the next business day after the Deadline for payment of the initial subscription price, the units in the selected New Sub-Funds will be considered subscribed by the respective investors and the units in the New Sub-Funds will be issued in the name of the particular investors. After satisfying the subscription orders and issuing the units in the New Sub-Funds in the name of the respective investors, the Price paid by the investors upon the Initial Subscription will be invested by the New Sub-Funds in accordance with their investment policies.

The initial subscription will be considered successful, regarding the respective New Sub-Fund, if non-binding applications for interest have been submitted for subscription of units of this New Sub-Fund in the amount of at least BGN 200,000 (two hundred thousand BGN).

If this Initial Subscription fails according to the criteria set out in the previous paragraph, KBC AM may decide not to proceed with the launch of the relevant New Sub-Fund(s) and to refuse to execute any non-binding expressions of interest made by investors, at no cost to these investors. This decision will be publicly announced on the website of the Branch (<a href="https://www.ubbam.bg">www.ubbam.bg</a>) and on the website of the Distributor (<a href="https://www.ubb.bg">www.ubb.bg</a>), and appropriate corrections will be made in this Prospectus, the rules, and other documents of the Umbrella Fund.

In addition, KBC AM will have the rights to extend the Initial Subscription Period by no more than twenty business days prior to the end Date of the initial subscription. In this case, KBC AM will duly notify the FSC, the Distributor and the Depositary of the extension of the Initial Subscription Period and will publish a notice of the extension on the Branch's website and on the Distributor's, website mentioned above.

After the end of the Initial Subscription Period, the issue and redemption of units in the New Sub-Funds will be carried out in accordance with the rules set out in the other subsections of this section.

# Submitting an order in case of inheritance by law

A redemption order of financial instruments submitted by heirs at law cannot be accepted before the financial instruments

have been transferred to the sub-account of the respective persons - heirs by using the services of an investment intermediary acting as a registration agent. After the transfer of the financial instruments to a sub-account of the heir, the heir acquires all the rights / obligations of his predecessor in relation to these instruments

# Submitting an order in case of inheritance by will

A redemption order of financial instruments submitted by heirs by will may not be accepted before the financial instruments have been transferred to the sub-account of the respective persons - heirs by using the services of an investment intermediary acting as a registration agent. After the transfer of the financial instruments to the sub-account of the heir, the heir acquires all the rights/ obligations of his predecessor in relation to these instruments.

#### Remarks

- 1. When the legislation in force provides for additional requirements for identification and representation, they shall be fulfilled by the Branch and the Distributor in the activity of issuing (selling) and redemption of units of the Sub-Funds, although they are not explicitly specified in these procedures.
- 2. In transactions and payments for purchase of units between the respective Sub-Fund and foreign investors, the special rules of the Foreign Exchange Act, the Income Taxes on Natural Persons Act, the Corporate Income Tax Act and other applicable legislation shall be observed relating to those persons.

# Rules for redemption of units

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of a Sub-Fund is carried out by submitting a written order by the investor (unit-holder in a Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The order is submitted at the points of sale and redemption of units of the Sub-Funds.

The written order must be accompanied with additional necessary documents (annexes), attached thereto. With the redemption order, the investor may request a number or amount for redemption.

After determining the redemption price per unit of a Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked.

After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Funds' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of a Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of said Sub-Fund, by submitting a new order in compliance with the rules, described above.

Only the redemption orders of units in a Sub-Fund which are submitted in accordance with all the requirements described in this section of the Prospectus are subject to execution. When there is a lack of information or there is ambiguity or contradiction between the requisites of the redemption order of units in a Sub-Fund and/ or necessary annexes, attached to it, the order is considered invalid and is not executed. The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order, for which the procedure applicable to confirm completed orders for redemption of units applies. In case the investor was issued a certification document for the units, held by him in the respective Sub-Fund, he shall provide it (in original) as an annex to the above-described documents.

# Necessary documents submitted by the investor when submitting redemption order for units in a Sub-Fund

When submitting a cancellation order, only documents on the procedure for identification and representation are presented, which certify that the person has the right to place the order.

If the order is made on behalf of a foreign person and it states that it will benefit from a special tax regime of full or partial tax exemption under a Double Tax Treaty, all documents required by Bulgarian law to prove these grounds shall be attached, including a declaration of the amount of the positive difference between the book value of the units, subject to redemption, and the redemption price. If a foreign person does not submit the necessary documents to prove the grounds for applying the relevant Double Tax Treaty or the declaration under the previous paragraph, the redemption order is still valid, but is executed in compliance with the general tax regime provided for foreign persons.

# Procedure for transfer of units in a Sub-Fund from a client sub-account kept at an investment intermediary to a client sub-account kept at the Distributor and vice versa.

The investor, its representative or proxy submits to a Distributor's branch, defined as a "point of sale", an order to the Distributor for transfer of the respective units to a sub – account opened with an investment intermediary. For this purpose, documents concerning the identification and representation are submitted. Only orders which are submitted in accordance with all the requirements described in this section of the Prospectus are subject to execution.

When there is a lack of information or there is ambiguity or contradiction between the data in the requisites of the order and/ or the necessary annexes, attached to it, as well as in case it is evident from the submitted documents that there is a defect in taking a corporate decision, in the representative power or in any other necessary condition for the disposal of the units, the order is considered invalid and is not subject to execution. If there are technical or other objective reasons, the order is executed as soon as possible.

# Simultaneous sale and purchase of units

Orders for simultaneous sale and purchase of units can be submitted only for units that are offered in the same currency.

If during the simultaneous sale and purchase of units it is evident that the balance of units on the balance of the investor in the fund from which the units are sold would be less than 1 (one) unit, the order should be submitted for all units held and the investor to annul his account.

The order for simultaneous sale and purchase of units is accepted in the offices of the Distributor, defined as a "point of sale" during their working hours. Orders placed after 17:00 on day "T" (the day of submission of the order) are executed at the prices valid for day "T + 1", determined on the next working day (day "T + 2"). For orders submitted after 17:00 on day "T", withdrawal of orders is accepted until 17:00 on the next working day (ie day "T + 1"). Thereafter, orders for the simultaneous sale and purchase of units are considered irrevocable.

An order for simultaneous sale and purchase of units cannot be submitted when the redemption of the units is temporarily suspended, and the suspension of the redemption is necessarily related to the suspension of the issuance of units.

An order for simultaneous sale and purchase of units is executed within 7 days from the date of submission.

# Suspension of the redemption of units in the Umbrella Fund and Sub-Funds

KBC AM by a decision of its competent corporate body will suspend temporarily the redemption of units of some or all Sub-Funds of the Umbrella Fund in exceptional cases, if the circumstances so require and if the suspension is justified in view of the interests of the unitholders, including in the following cases:

- where the conclusion of transactions on a regulated market on which a significant portion of the assets of one or more Sub-Funds are admitted to trading is terminated, suspended or subject to restriction;
- where the assets or liabilities of one or more Sub-Funds cannot be correctly valued or KBC AM may not dispose
  with them without harming the interests of the unitholders;
- where a decision is taken for the liquidation or transformation through merger or acquisition of the Umbrella Funds or one or more Sub-Funds;
- in the case of termination of the contract with the Custodian due to culpable non-fulfilment of its obligations, revocation of its banking license or imposition of other restrictions on its activity, which make it impossible for the Custodian to fulfil its obligations under the custody contract and may damage the interests of the holders of units of the one or more Sub-Funds;
- in the case where a decision is taken for the liquidation or transformation of the Master Umbrella Fund or a Master Sub-Fund.

In addition, KBC AM may by a decision of its competent corporate body suspend temporarily the redemption of units of

some or all Sub-Funds of the Umbrella Fund where the Master Umbrella Fund or one or more of the Master Sub-Funds have suspended temporarily the redemption of their respective units.

In the cases above the Branch shall notify the FSC, the Custodian and the Distributor in its capacity as distributor of the Umbrella Fund of the decision taken by the end of the business day and shall notify them accordingly of the resumption of redemption by the end of the business day preceding the day of the resumption.

When taking a decision to temporarily suspend the redemption of one or more Sub-Funds KBC AM shall also halt immediately the issuance of new units for the period of suspension of redemption, where such period has been set.

Where the initial suspension period must be extended the Branch shall notify the FSC and the Custodian of this circumstance no later than 7 days prior to the lapsing of the time period initially set. Where the suspension period is shorter than 7 days, including where the redemption of units has been suspended due to technical reasons, the Branch shall issue the notification under the preceding sentence by the end of the business day preceding the end date of the initial suspension period.

The redemption of units shall be resumed by decision of the competent corporate body of KBC AM following the end of the suspension period determined in the original suspension decision or any subsequent decision on the extension of this period.

The Branch shall notify the unitholders of the decision for suspension of redemption and of the subsequent decision on resumption thereof, immediately after passing such decisions through the website of the Branch <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

Orders made after the last publication of a redemption price and before the beginning of the suspension period shall not be executed. The Branch acting through the Distributor shall refund the amounts to the investors, who have submitted subscription orders, on their bank account or at a Distributor's cash desk by the end of the business day, following the day of submitting the orders.

# Rules for the valuation of the assets

The Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds detail the rules and the process for valuation of the assets and liabilities of each Sub-Fund, as well as the method of determining the net asset value and the net asset value distributed per unit of each Sub-Fund. The Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds are attached to this Prospectus and form an integral part of it.

# Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds

# Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of each Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section Fees and charges, which are paid by the unitholders in the Sub-Funds of Section H. "Fees and charges regarding the Umbrella Fund" below.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section Fees and charges, which are being paid by the unitholders in the Sub-Funds of Section H. "Fees and charges regarding the Umbrella Fund" below. Investors who hold their units in a Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e., the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

# Procedure for calculation of the net asset value, issue price and redemption price

The NAV of the Sub-fund is determined each day ("day on which valuation is carried out" or day T+1) for the preceding day ("day for which the evaluation is carried out " or day T) in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds, this Prospectus and the applicable legislation.

Portfolio valuation is carried out by the Branch, which determines the NAV of each Sub-Fund and the NAV per unit of each Sub-Fund and calculates the respective issue price and redemption price under the control of the Custodian.

The determination of the NAV, issue price and redemption price for each Sub-Fund is carried out as follows:

- 1. Until 10:00 hours on the day on which the evaluation is carried out (day T+1) the Branch receives from the Distributor information on the issuance and redemption transactions for each Sub-Fund, which have been settled at the end of day T, as well as on the number of units in circulation of each Sub-Fund at the end of the day T.
- 2. Between 10:00 and 13:00 hours on day T+1:
- the fair value of the assets of each Sub-Fund is determined for day T in accordance with the Rules for valuation of
  the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds; the data and/or the
  analysis used for determining the fair value are recorded within the calculation process.
- the assets of each Sub-Fund are revaluated at their fair value, a balance of the Sub-Funds is prepared and the NAV
  per unit, the issue price and redemption price of each Sub-Fund is determined for day T.
- 3. Until 13:00 hours on day T+1 the Branch provides to the Custodian all the information used for the determination of the NAV for each Sub-Fund (including the number of issued and redeemed units with completed settlement), as well as the estimated issue price and redemption price.
- 4. Until 14:00 hours on day T+1 the Branch receives confirmation from the Custodian for the calculated NAV, issue price and redemption price.
- 5. The Branch, by 17:00 hours of each respective day T+1, publishes the NAV, issue price and redemption price of the units of each Sub-Fund for day T.
- 6. The Branch announces to the FSC summary information on the issue and redemption prices of the units of the Sub-Funds once a month within three working days from the end of the month.
- 7. When calculating the NAV, issue price and redemption price, the Branch uses appropriate software that allows it to keep accounts of each Sub-Fund separately from its own.
- 8. All documents and information used to determine the NAV, issue price and redemption price shall be kept by the Branch on paper, magnetic, optical or other technical media for at least 5 years, in a manner that provides access to the information only to authorised personnel. For additional security, the information is stored on a second magnetic medium.

## Publication of the net asset value

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T is published no later than 17:00 hours on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# Rules for determination and distribution of the income

The Sub-Funds of the Umbrella Fund do not distribute their accumulated profit as dividend among their unitholders. KBC AM reinvests the profit of each individual Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of each respective Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of each Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

# Rules on payments in favour of the unitholders of the Sub-Funds

Payments in favour of the unitholders of the Sub-Funds in connection with redemption orders of units, is carried out by the Branch in favour of the unitholders to an explicitly specified bank account of the unitholder opened with the Distributor. After placing a redemption order of units in a Sub-Fund, the redemption of the units is registered with the Central Depository AD on the following business day, based on the calculated redemption price of the units. After the settlement of the transaction, within 10 days of the registration of the order, payment of the amount under the redemption order of units in the respective Sub-Fund is made to the bank account, which the client has indicated in the order.

# Places where additional information regarding the Umbrella Fund and the Master Umbrella Fund can be obtained

# Ways of receiving the rules and financial statements of the Umbrella Fund and Sub-Funds

Investors can find the Umbrella Fund Rules, the Prospectus, the Key Information Documents, the annual and semi-annual financial statements and the current NAV, issuance and redemption prices of the Umbrella Fund and its Sub-Funds in Bulgarian language free of charge in all branches of the Distributor during their normal business hours, as well as on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and the website of the Branch under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies). Upon request investors can receive a paper copy of the Prospectus, the Key Information Documents and the latest annual and semi-annual financial statements of the Umbrella Fund and its Sub-Funds free of charge in all branches of the Distributor during their normal business hours.

Investors can receive additional information on the Umbrella Fund and the Sub-Funds in all branches of the Distributor during their normal business hours.

Ways of receiving additional information regarding the Master Umbrella Fund, its Master Sub-Funds and the agreement between the Umbrella Fund and the Master Umbrella Fund Investors can find the Prospectus, the Key Information Documents, the latest periodic financial disclosures and the current issuance and redemption prices of the Master Umbrella Fund and the Master Sub-Funds in English and Dutch languages free of charge on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>. Upon request investors can receive a paper copy of the Prospectus and the latest annual and semi-annual financial statements of the Master Umbrella Fund and its Master Sub-Funds free of charge at all branches of the Distributor during their normal business hours.

Additional information on the rules governing the transmission of information and other aspects of the relationship between the Umbrella Fund and the Master Umbrella Fund can be found in Bulgarian language on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the website of the Branch under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# D. Investment objective of the Umbrella Fund and Sub-

# **Funds**

The investment objective of the Sub-Funds of the Umbrella Fund is to invest all or substantially all, but in any event at least 85%, of their assets in corresponding Master Sub-Funds of Horizon, to hold ancillary liquid assets (cash) up to an amount necessary for meeting their ongoing expenses and to have limited derivative positions for risk-hedging purposes.

The investment objective of the Master Sub-Funds is to generate the highest possible return for their shareholders in accordance with their investment policies. This is reflected in their pursuit of capital gains and income. To this end, the assets of each of the Master Sub-Funds are invested, either directly or indirectly via correlated financial instruments.

Investors can find further information on the investment objective, policy, and restrictions of each individual Sub-Fund in Part II *Information concerning the Sub-Funds* of this Prospectus.

# Declaration under art. 7 Regulation (EU) 2019/2088

For the Master Sub-Funds, and in this connection for the Sub-Funds investing in these Master Sub-Funds, it should be borne in mind that, at the date of this Prospectus, the Master Sub-Funds do not specifically seek to invest in environmentally sustainable economic activities under the taxonomy framework of the EU, and the investments underlying these financial products do not comply with EU criteria for environmentally sustainable economic activities. This will be actively reviewed once sufficiently reliable, timely and verifiable data is available from issuers or companies in which it has invested and finalized regulatory technical standards are published, providing more detailed information on the Sustainable Finance Disclosure Regulation (SFDR) and other disclosures related to the EU taxonomy, this will be reassessed and the Prospectus will be updated as appropriate.

#### Transparency of adverse sustainability impacts

The Master Sub-Funds consider the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related exclusion policy for conventional and responsible Investing funds and the Exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting. Information on the principal adverse impacts on sustainability factors can also be found in the annual report for each sub-fund, which will be published after 1 January 2023.

## Permitted derivatives transactions

All Sub-Funds may use derivative financial instruments for risk-hedging purposes, including to hedge market risk resulting from the timing difference between the fulfilment of redemption and subscription orders in the respective Sub-Funds and their fulfilment in the corresponding Master Sub-Funds.

In accordance with applicable law, the Sub-Funds can invest in derivative financial instruments, including without limitation futures, which are:

- exchange traded derivative financial instruments, including equivalent cash-settled instruments, which are either:
  - admitted to trading or traded on a regulated market licensed in accordance with Directive 2014/65/EU (MiFID II) in Bulgaria or another EEA state,

- traded on another regulated market in Bulgaria or another EEA state, which operates regularly and is recognised and publicly accessible; or
- admitted to trading or traded on an official market of a stock exchange or another regulated market in a third country, included in a list published by the FSC;
- derivative financial instruments traded over the counter (OTC), provided that:
  - their underlying assets are transferable securities and money market instruments admitted to trading or traded on a MiFID II regulated market, financial indices, interest indices, currencies or foreign exchange rates in which a Sub-Funds may invest in accordance with its investment policy;
  - the counterparty to the transaction in such derivative financial instruments is an institution subject to prudential supervision, which meets requirements approved by the FSC;
  - are subject to reliable and verifiable valuation on a daily basis and, at the initiative of KBC AM, may be sold, liquidated or closed by an offsetting transaction at any time at fair value.

The total exposure to derivative instruments of each Sub-Fund may not exceed its net asset value. For this purpose, each Sub-Fund shall calculate its total risk exposure by combining either its own risk exposure to derivative instruments with the actual risk exposure to derivative financial instruments of its corresponding Master Sub-Fund in proportion to the amount of its investment in the Master Sub-Fund, or with the maximum total exposure of the Master Sub-Fund to derivative financial instruments, provided for in its governing documents, in proportion to the amount of its investment in the Master Sub-Fund.

The risk exposure and counterparty risk of each Sub-Fund shall be calculated in accordance with the requirements of Ordinance No 44 and the Guidelines of the Committee of European Securities Regulators (CESR) on measuring the risk and calculating the total risk exposure and counterparty risk of collective investment schemes (Ref.: CESR / 10-788). The commitment method is used to calculate the total risk exposure.

The use of derivatives on the level of each Sub-Fund does not lead to a material change in the investment objectives of the Sub-Funds or to higher risk profiles of the Sub-Funds than those laid down in the Umbrella Fund Rules, this Prospectus or the governing documents of their corresponding Master Sub-Funds.

In particular, the use of derivatives to hedge the market risk resulting from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Funds and their corresponding Master Sub-Funds, aligns the risk profiles of the Sub-Funds and the Master Sub-Funds. The credit risk of the counterparties to hedging transactions can be managed effectively through the choice of prime financial counterparties and the collection by KBC AM of appropriate collateral (where relevant) in accordance with the Umbrella Fund's collateral policy. Nonetheless, no risk can be fully neutralised so that the Sub-Funds and consequently investors may suffer losses in the event that certain risks connected with transacting in derivatives materialise.

Investors can find more information on the risks connected with the entry into derivatives transactions by KBC AM on behalf of the Sub-Funds in sub-section *Risks resulting from the usage by the Sub-Funds of derivatives for hedging purposes* of section G. *General information on the risk profile of the Sub-Funds* below.

# Techniques for efficient portfolio management

KBC AM, when acting on behalf of the Sub-Funds, does not intend to employ techniques and instruments for efficient portfolio management within the meaning of Article 50, paragraph 1 of Ordinance No 44 – repo transactions.

# Information on the collateral policy and the policy for anticipating potential losses from assets received as collateral

In the event that KBC AM, acting on behalf of a Sub-Fund, enters into transactions with OTC derivative instruments, KBC AM, acting on behalf of a Sub-Fund, may receive collateral in order to reduce the risk of insolvency of the counterparty to such transaction. Any collateral received for this purpose must comply with applicable law, in particular with regard to the liquidity, valuation, quality of the issuer, the correlation and risk associated with collateral management. In collecting and managing collateral, the Management Company, acting on behalf of the Sub-Funds, shall also take into account the relevant sections of the European Securities and Markets Authority's Guidelines for competent authorities and UCITS management companies (Ref.: ESMA/2014/937). Considering that the investment objectives of the Sub-Funds of the Umbrella Fund are to invest at least 85% of their assets in the respective Master Sub-Funds of Horizon, and in this regard they may have only limited derivative positions for hedging purposes, KBC AM, acting at the expense of the Sub - Funds, does not envisage receiving collateral in amount of and over 30% of the assets of the respective Sub-Funds.

In cases where transactions with OTC financial derivatives are carried out on behalf of a Sub-Fund, any collateral used to reduce the risk exposure to the counterparty shall at all times take into account the following criteria:

- liquidity any non-cash collateral should be highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing so that it can be sold quickly at a price close to its prior valuation the sale; the received collateral should meet the requirements of art. 49 ACISOUCIA;
- valuation the resulting collateral should be valued at least once a day and assets showing high price volatility should not be accepted as collateral unless sufficiently conservative levels of potential losses are provided;

- high credit rating of the issuer of the assets provided as security;
- correlation the collateral received from the relevant Sub-Fund should be issued by an entity that is
  independent from the counterparty and which is expected not to show strong dependence on the results of
  the counterparty's activity;
- diversification of collateral collateral should be diversified in terms of countries, markets and issuers, with the risk for a given issuer not exceeding 20% of the net asset value of the relevant Sub-Fund;
- risks related to the collateral management;
- collateral received must be held by the Custodian;
- in the event of default of the counterparty, the Management Company/Branch acting on behalf of the Sub-Fund may liquidate the collateral at any time without notice to the counterparty or its approval
- assets of non-cash collateral received may not be sold, reinvested or pledged before the occurrence of an event of default of the counterparty;
- the cash collateral can only be deposited with a credit institution under Article 38, paragraph 1, item 6 of ACISOUCIA;

KBC AM, acting on behalf of the Sub-Funds, can accept the following types of collateral:

- cash:
- bonds issued or guaranteed by an EEA state or another country party to the Agreement on the Organization for Economic Cooperation and Development, their central banks, their local authorities, the European Central Bank, the European Investment Bank or a public international organization, in which is a member of at least one EEA state, as well as debt securities issued or guaranteed by third countries with a credit rating not lower than investment grade, assigned by a credit rating agency registered or certified under Regulation (EU) 1060/2009.

The Management Company determines the required level of collateralisation in accordance with the counterparty risk limits applicable to the respective Sub-Fund, taking into account the nature and characteristics of the transactions, the counterparty, its creditworthiness and the prevailing market conditions.

The Management Company shall decide on the haircut applicable to an asset received as collateral based on the following factors:

- type of collateral received;
- maturity of the asset provided as collateral (if applicable);
- credit rating of the issuer of the asset provided as collateral (if applicable).

KBC AM can decide on an additional haircut of the collateral provided, if it is denominated in a currency other than the Furo.

Non-cash collateral is kept by the Custodian, on behalf of the Sub-Funds. Assets received as collateral cannot be sold, reinvested or pledged by the Management Company before the occurrence of an event of default of the counterparty to an OTC derivatives transaction. KBC AM, acting on behalf of a Sub-Fund, can sell financial instruments received as collateral, where the counterparty has defaulted on its obligations under the derivatives contract and the terms of the contract give the Sub-Fund such rights.

Cash collateral can be deposited with a credit institution under Article 38, paragraph 1, item 6 of ACISOUCIA.

In the event that KBC AM, acting on behalf of a Sub-Fund, enters into transactions with OTC derivative instruments, KBC AM may also provide collateral on behalf of the Sub-Fund in order to reduce the exposure of the Sub-Fund to the counterparty to the OTC derivatives transaction.

The collateral provided shall be sufficiently liquid so that it can be sold quickly at a price that is close to its pre-sale valuation. When calculating the risk exposure of the Sub-Fund to the counterparty to the OTC derivatives transaction, the Management Company takes into account the investment and concentration restrictions applicable to the Sub-Fund. The collateral provided on behalf of the Sub-Fund may be taken into account on a net basis only if the Management Company is able to legally enforce netting arrangements with the counterparty to the OTC derivatives transaction on behalf of the Sub-Fund.

# **Use of loans**

KBC AM and the Depositary, when acting on behalf of the Sub-Funds, may not use loans, except in cases and in compliance with the requirements of ACISOUCIA. In this regard, after approval by the FSC, KBC AM and the Depositary, when acting at the expense of Sub-Funds may enter into credit agreements and use loans of up to 10% of the assets of relevant Sub-Fund if the following conditions are simultaneously fulfilled:

• the loan is for a period not longer than three months and is necessary to cover the liabilities on the redemption of the units in the Sub-Fund;

• the terms of the loan agreement comply with the market standard terms.

# E. Information on the Master Umbrella Fund and the

# **Master Sub-Funds**

# Short description of the Master Umbrella Fund

The Master Umbrella Fund – Horizon N.V. – is established in the legal form of a Belgian law limited liability company (*Naamloze Vennootschap*) and has its registered office in Havenlaan 2, B-1080 Brussels, Belgium.

The Master Umbrella Fund is a public open-ended investment company under Belgian law with a variable number of units opting for investments complying with the conditions of the UCITS Directive and is authorised by the Financial Services and Markets Authority in Belgium with code 00260. Horizon's share capital is at all times equal to its net asset value and may not be less than EUR 1 200 000.

Horizon is an umbrella UCITS with various investment compartment (sub-funds), including the Master Sub-Funds, which, as far as its operations and investments are concerned, is governed by the Belgian Law of 3 August 2012 relative to undertakings for collective investment complying with the conditions of Directive 2009/65/EC and the undertakings for investment in receivables.

Horizon has appointed KBC AM as its management company, which is also management company of the Umbrella Fund. Custodian of the Master Fund is KBC Bank NV, a licensed credit institution duly incorporated and existing under the laws of Belgium, having its seat and registered office at Havenlaan 2, B-1080, Brussels, Belgium.

Investors can find further information on the Master Umbrella Fund, its third-party service providers, its organisation, cost and charges structure and its sub-funds, in the Master Umbrella Fund Prospectus (please refer to Section Ways of receiving additional information regarding the Master Umbrella Fund, Master Sub-Funds and the agreement between the Umbrella Fund and the Master Umbrella Fund of this Prospectus).

# **Short description of the Master Sub-Funds**

The Master Sub-Funds – Horizon KBC Defensive Balanced, Horizon KBC Defensive Tolerant, Horizon KBC Dynamic Balanced, Horizon KBC Dynamic Tolerant, Horizon KBC Defensive Conservative Responsible Investing, Horizon KBC Defensive Balanced Responsible Investing, Horizon KBC Dynamic Balanced Responsible Investing, Horizon KBC Defensive Tolerant Responsible Investing, Horizon KBC Dynamic Tolerant Responsible Investing, Horizon KBC Dynamic Tolerant Responsible Investing – are investment compartments of the Master Umbrella Fund. The Master Sub-Funds are established for an unlimited period of time and are not listed on a regulated market or another organized marketplace.

In the relationship between the investors in the Master Umbrella Fund, each Master Sub-Fund is to be viewed as a separate entity, the liabilities of which are covered only by the assets of that Master Sub-Fund. Investors in each Master Sub-Fund have a right only to the assets of and return from the Master Sub-Fund in which they have invested.

For particular Master Sub-Funds there is one corresponding LEVA Sub-Fund and one EUR Sub-Fund, which invest at least 85% of their assets in units from the respective Institutional F shares BG class of a Master Sub-Fund, and for the other Master Sub-Funds there is only one corresponding LEVA Sub-Fund, which invests at least 85% of its assets in units from the respective Institutional F shares BG class of the particular Master Sub-Fund. Therefore, the investment objectives, policies, and restrictions of the Master Sub-Funds have direct and significant influence on the investment objectives, policies, and restrictions of their corresponding Sub-Funds.

Investors can find further information on each of the Master Sub-Funds, their investment objectives and policies, including their risk profile in the sections on their corresponding Sub-Funds in Part II *Information concerning the Sub-Funds* of this Prospectus.

# Summary of the agreement between the Umbrella Fund and the Master Umbrella Fund

In accordance with the requirements of ACISOUCIA and Ordinance No 44 a master feeder cooperation agreement has been entered into between the Umbrella Fund and the Master Umbrella Fund (the "Cooperation Agreement"), pursuant to which the parties have agreed *inter alia* on the following:

 The rules under which the Master Umbrella Fund provides access to information to the Umbrella Fund on activity of the Master Umbrella Fund, including for any delegation to third parties of the investment management or risk management of the Master Umbrella Fund and on its incorporation documents, financial data, prospectus and Key Information Documents of each Master Sub-Fund, as well as for the amendments made thereof:

- The characteristics of the share class of the Master Sub-Funds, in which Sub-Funds will invest;
- The rules that will be followed by the parties to inform each other in the cases of changes in their status, including if the Umbrella Fund ceased or will cease to comply with the requirements for feeder UCITS or the Master Umbrella Fund ceased or will cease to meet the qualifying conditions to be a master UCITS; the management company, the custodian or the auditor of the Master Umbrella Fund or the Umbrella Fund will be replaced or will be replaced any third person to whom investment management and risk management functions are delegated; any amendment to the Master Sub-Funds which relates to the investment objective, investment policy, distribution policy, subscription and redemption orders process, fees or service providers; any planned or proposed winding up, merger or division of any of the Master Sub-Fund, et cetera;
- The rules for coordination the frequency and timing of the net asset value calculation process and the publication of prices of units in the Sub-Funds and the Master Sub-Funds, including policies and procedures that must be applied to prevent malpractices that might reasonably be expected to affect the integrity of the market, such as market timing and late trading:
- The settlement cycles and payment details for subscriptions and redemptions of shares in the Master Sub-Funds and the other necessary dealing arrangements between the Umbrella Fund and the Master Umbrella Fund in this regard;
- The procedure, which will be followed in case of temporarily suspension of subscription and redemption of the shares or units in a Master Sub-Fund or a Sub-Fund;
- The obligations of the parties in relation to the coordination of the production of their periodic financial reports and the audit to be carried out by their statutory auditors;
- The rules on the provision of assistance by the Master Umbrella Fund in the cases of complaints of unitholders of the Sub-Funds in relation to the Master Sub-Funds.

Upon request, unitholders of the Sub-Funds may receive a paper copy of the Cooperation Agreement in Bulgarian free of charge at all offices of the Distributor, designated as "points of sale", as well as at the office of the Branch.

# Applicable tax legislation to the Umbrella Fund and the Sub-Funds in relation to the investment in the Master Sub-Funds

The Umbrella Fund and its Sub-Funds will not be subject to taxation in the county where the Master Umbrella Fund and Master Sub-Funds are domiciled in relation to their investment in the Master Sub-Funds.

# F. Social, ethical and environmental aspects

The Sub-Funds of the Umbrella Fund are feeder sub-funds, which invest at least 85% of their assets in corresponding Master Sub-Funds of Horizon. Therefore, certain social, ethical and environmental aspects of the investment policies of each of the Master Sub-Funds have indirect impact on unitholders' investment in the Sub Funds.

The investment policies of each of the Master Sub-funds takes into account certain social, ethical and environmental aspects against which issuers are being assessed. Investments may not be made in:

- financial instruments issued by manufacturers of controversial weapon systems that are prohibited by international (and national) law or for which there is a broad consensus that they should be banned. These weapon systems include: cluster bombs and sub-munitions, chemical or biological weapons, anti-personnel mines (including Claymore mines), weapons containing depleted uranium;
- financial instruments issued by manufacturers of weapons containing white phosphorus and nuclear weapons;
- financial instruments issued by companies where there are serious indications that they are perpetrators of, accomplices or accessories to, or stand to benefit from the violation of globally recognised standards of responsible investing. The main criteria used cover human rights, employee rights, the environment and anticorruption.

In this way, not only is a purely financial reality represented, but also the social reality of the sector or region. This list of exclusion criteria is not exhaustive.

A complete overview of the exclusion criteria can be found at <u>www.kbc.be/investment-legal-documents</u> > General exclusion policies for conventional and responsible investing funds.

These exclusion criteria can be modified at any time by the management company.

Additional criteria for responsible investing ("RI") apply to certain Master Sub-Funds. These RI criteria are set out for

each of these Master Sub-Funds in the "Master Sub-Fund's Investment Policy" Subsection in the relevant Section 2 "Investor Information" of Part II "Information concerning the Sub-Funds" of this Prospectus, for each of the Sub-Funds investing in shares of such Master Sub-Funds, as well as on <a href="https://www.kbc.be/investment-legal-documents">www.kbc.be/investment-legal-documents</a>> Exclusion policies for responsible investing funds.

For the other Master Sub-Funds, and for the other Sub-Funds that invest in these Master Sub-Funds, it should be considered that investments in the portfolio of these financial products do not take into account the EU criteria for environmentally sustainable economic activities.

# G. General information on the risk profile of the Sub-

# **Funds**

The risk associated with investing in financial instruments represent the potential for the actual return on an investment to be different than expected. Generally, risk is the possibility of realising a loss of part or even the whole investment made.

Investors in the Sub-Funds should be informed of the typical risks associated with investing in financial instruments such as the units in the Sub-Funds so that they can determine their risk profile and make investment decisions based on their individual investment objectives, willingness to take risks, etc. Investors can find further information on the risk profile of the targeted investor in each of the Sub-Funds in the respective Section 3 *Risk* of Part II *Information concerning the Sub-Funds* of this Prospectus in relation to each of the Sub-Funds.

Investors in units of one or more Sub-Funds should be aware that the information set out below does not constitute, nor is it intended to be, any form of legal, tax, investment, or any other type of advice. Investors should seek assistance of their own legal, tax, financial or other consultants – as they deem necessary – in order to understand fully the nature and the risks associated with investing in units issued by funds such as the Sub-Funds.

# List of risks

The information below is a general overview of the potential risks that the investor could incur. The list of risks relevant for the Sub-Funds is divided into three categories – Risks resulting from the usage by the Sub-Funds of derivatives for hedging purposes, which are equally relevant for the investment in each Sub-Fund, Risks resulting from the master-feeder structure, which are equally relevant for the investment in each Sub-Fund, and Risks resulting from the underlying investment in a Master Sub-Fund, which may differ depending on the individual risk profile of each Master Sub-Fund underlying their investment in a feeder Sub-Fund.

The assessment of the risks of each Sub-Fund can be accessed under Section 3 *Risk* of Part II *Information concerning the Sub-Funds* of this Prospectus in relation to each of the Sub-Funds. There, a list of specific risks for the relevant Sub-Fund resulting from its investment in a Master Sub-Fund may be consulted, with an indication of the risk assessment, and a brief justification for the risk assessment.

# Risks resulting from the usage by the Sub-Funds of derivatives for hedging purposes

The Sub-Funds may engage in derivatives transactions in order to hedge risks associated with their portfolio. Such derivatives may be exchange traded derivatives or OTC derivatives including but not limited to futures, forward contracts, swaps and options. Prices of derivatives are highly volatile and may be subject to various types of risks, including but not limited to market risk, liquidity risk, credit risk, counterparty risk, legal risk and operations risks.

The proposed financial derivative instruments ("FDI") which may be used by a Sub-Fund and commercial purpose of same are set out in Part II *Information concerning the Sub-Funds* of this Prospectus in relation to each of the Sub-Funds.

Specific risks associated with the use of FDI are summarised below.

# Substantial Risks are Involved in Trading Financial Derivative Instruments.

The prices of FDIs, including futures and options prices, may be highly volatile. Price movements of forward contracts, futures contracts and other derivative contracts are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programmes and policies of governments, national and international political and economic events or changes in local laws and policies. In addition, governments from time to time intervene, directly and by regulation, in certain markets, e.g. markets in currencies or interest rates. Such intervention often is intended directly to influence prices and may, together with other factors, cause markets to move rapidly in the same direction.

The use of FDIs for hedging purposes also involves certain special risks, including (1) dependence on the ability to predict movements in the prices of investments being hedged, (2) imperfect correlation between the hedging instruments and the investments or market sectors being hedged which may result in an imperfect hedge of these risks and a potential loss of capital, (3) the fact that skills needed to use these instruments are different from those

needed to select the respective Sub-Fund's other investments, and (4) the possible absence of a liquid market for any particular instrument at any particular time.

In addition, the use of derivatives can involve significant economic leverage and may, in some cases, involve significant risks of loss. The low initial margin deposits normally requires to establish a position in such instruments permits leverage. As a result, a relatively small movement in the price of the underlying contract may result in a profit or a loss that is high in proportion to the amount of assets actually placed as initial margin and may result in unlimited further loss exceeding any margin deposited. Should this occur, investors could, in certain circumstances, face minimal or no returns, or may even suffer a loss on their investment in that particular Sub-Fund. Also, the ability to use these strategies may be limited by market conditions and regulatory limits and there can be no guarantee that any of these strategies will meet their expected target.

# OTC Markets Risk and Derivatives Counterparty Risk

Where the respective Sub-Fund acquires investments on OTC markets, there is no guarantee that this Sub-Fund will be able to realise the fair value of such investments as they may have limited liquidity and high price volatility as there is no exchange on which to close out an open position and it may be difficult to assess the value of a position and its exposure to risk.

The participants in OTC derivative markets are typically not subject to the same level of credit evaluation and regulatory oversight as that imposed on members of "exchange-based markets". A Sub-Fund may have credit exposure to counterparties by virtue of positions in OTC derivative contracts. In addition, a counterparty may not settle a transaction in accordance with its terms and conditions, because the contract is not legally enforceable or because it does not accurately reflect the intention of the parties or because of a dispute over the terms of the contract (whether or not bona fide) or because of a credit or liquidity problem, thus causing a Sub-Fund to suffer a loss. To the extent that a counterparty defaults on its obligation and a Sub-Fund is delayed or prevented from exercising its rights with respect to the investments in its portfolio, it may experience a decline in the value of its position, lose income and incur costs associated with asserting its rights. Counterparty exposure will be in accordance with the Sub-Fund's investment restrictions. Regardless of the measures a Sub-Fund may implement to reduce counterparty credit risk, however, there can be no assurance that a counterparty will not default or that a Sub-Fund will not sustain losses on the transactions as a result.

#### Settlement Risk

As some of the derivative instruments in which a Sub-Fund may invest may be traded on markets where the trading, settlement and custodial systems are not fully developed, the derivative instruments of a Sub-Fund which are traded in such markets and which have been entrusted to sub-custodians in such markets may be exposed to risk in circumstances in which the Custodian may not have any liability according to the legislation in force.

#### Legal Risk

Derivative transactions may also carry legal risk in that the use of standard contracts to effect derivative transactions may expose a Sub-Fund to legal risks such as the contract may not accurately reflect the intention of the parties or the contract may not be enforceable against the counterparty in its jurisdiction of incorporation. Furthermore, contractual asymmetries and inefficiencies can also increase risk, such as break clauses, whereby a counterparty can terminate a transaction on the basis of a certain reduction in the net asset value, incorrect collateral calls or delay in collateral recovery.

#### **Position Risk**

When a Sub-Fund purchases transferable securities, the risk to the Sub-Fund is limited to the loss of its investment. In the case of a transaction involving FDI that Sub-Fund's liability may be potentially unlimited until the position is closed.

# **Correlation Risk**

The prices of derivative instruments may be imperfectly correlated to the prices of the underlying securities, for example, because of transaction costs and interest rate movements. The prices of derivative instruments may also be subject to change due to supply and demand factors.

# Loss of favourable performance

The use of derivative instruments to hedge or protect against market risk may reduce the opportunity to benefit from favourable market movements.

## **Liquidity Risk**

Each Sub-Fund may only enter into OTC transactions with counterparties which are contractually obliged to close out a position on request. However, this is subject to the Sub-Fund being able to enforce the provisions of the relevant contract against the relevant counterparty effectively and promptly. In addition, should the Sub-Fund enforce this contractual right to close out the relevant position, this may result in significant losses.

## Margin Risk

A Sub-Fund may be obliged to pay margin deposits and option premia to brokers in relation to futures and option contracts entered into for the Sub-Fund. While exchange traded contracts are generally guaranteed by the relevant exchange, the relevant Sub-Fund may still be exposed to the fraud or insolvency of the broker through which the transaction is undertaken. The Sub-Funds will seek to minimise this risk by trading only through high quality names.

#### **EMIR Risk**

European Union Regulation No 648/2012 on OTC derivatives, central counterparties and trade repositories as amended (also known as the European Market Infrastructure Regulation, or "EMIR"), which applies to the Umbrella Fund, applies uniform requirements in respect of OTC derivative contracts by requiring certain "eligible" OTC contracts to be submitted for clearing to regulated central clearing counterparties and by mandating the reporting of certain details of OTC contracts to trade repositories. In addition, EMIR imposes requirements for appropriate procedures and arrangements to measure, monitor and mitigate operational counterparty credit risk in respect of OTC contracts which are not subject to mandatory clearing. Those OTC contracts which are subject to the requirements of EMIR may subject to the relevant Sub-Fund to increased trading costs as a result of new or increased collateral requirements.

# Risks resulting from the master-feeder structure

Unless stated otherwise, the risks set out in this category are equally relevant for all Sub-Funds of the Umbrella Fund. Therefore, investors should consider these risks before investing in units of one or more Sub-Funds.

#### Master-feeder risk

The risk arising from the fact that the Sub-Funds' performance depends substantially on the investment policy as well as the market trends of individual investments of the corresponding Master Sub-Funds and cannot be determined in advance. Each Sub-Fund will invest all of its assets in the corresponding Master Sub-Fund (excluding any holding of ancillary liquid assets and derivatives) and, accordingly, will not be diversified, but instead will seek to achieve diversification at Master Sub-Fund level.

#### Concentration risk

The risk relating to the concentration of substantially all of the assets of the Sub-Funds in shares of the Master-Sub-Funds and, accordingly, will not be diversified. This means that the performance of individual Master Sub-Funds will have a substantial impact on the value of their corresponding Sub-Funds' portfolios. However, the Master Sub-Funds will have diversified portfolios of assets in accordance with their investment policy, thus limiting the concentration risk.

# Liquidity risk

The risk that a position cannot be liquidated in a timely manner at a reasonable price. This means that a Sub-Fund can only liquidate its assets at a less favourable price or after a certain period. This risk exists, e.g. if a Sub-Fund invests its assets exclusively in instruments of its corresponding Master Sub-Fund and redemption orders from a large number of investors are placed simultaneously.

## **Custody risk**

The risk of loss of assets held in custody as a result of insolvency, negligence or fraud on the part of the Custodian or a sub-custodian.

## Operational risk

The risk of loss of assets due to failure of internal processes/systems, employee failure or misconduct or external events (e.g. natural disasters and humanitarian crisis).

#### Inflation risk

The risk of economic loss as a result of inflation.

# Legal risk

The risk of changes to the legal framework governing the organisation of the Sub-Funds or the investment in units thereof, e.g. change in the applicable tax treatment of the investment.

# No Investment Guarantee

The investment in Sub-Funds is not in the nature of a bank deposit and is therefore not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account.

# **Market Risk**

Due to the same dealing deadline being applied to both the Sub-Funds and the corresponding Master Sub-Funds, there can be a delay between when subscription or redemption orders are placed in the Sub-Funds and when the corresponding orders are processed in the Master Sub-Funds. This results in an element of market risk in the Sub-Funds which can be mitigated through the use of futures by the respective Sub-Funds (for the risks related to the usage of FDIs, see subsection *Risks resulting from the usage by the Sub-Funds of derivatives for hedging purposes* above).

# Risks resulting from the underlying investment in a Master Sub-Fund

The risks set out in this category represent typical risks that investors could incur when investing in non-feeder UCITS such as the Master Umbrella Fund and its Master Sub-Funds. Due to the fact that the Sub-Funds invest at least 85% of their assets in shares of their corresponding Master Sub-Funds, unitholders in Sub-Funds are *indirectly* exposed to some or all of these risks, depending on the investment policy and individual risk profile of the Master Sub-Fund underlying their investment in a feeder Sub-Fund.

Investors may consult Section 3 *Risk* of Part II *Information concerning the Sub-Funds* of this Prospectus for an individual assessment of the relevance of each of these risks for the investment in each of the Sub-Funds.

#### Market risk

The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio. In an equity fund, for instance, this is the risk that the equity market in question will go down and, in a bond fund, the risk that the bond market in question will fall. The higher the volatility of the market in which a Master Sub-Fund invests, the greater the risk. Such markets are subject to greater fluctuations in return.

#### Credit risk

The risk that an issuer or a counterparty will default and fail to meet its obligations towards a Master Sub-Fund. This risk exists to the extent that a Master Sub-Fund invests in debt instruments. Debtor quality also affects the credit risk (e.g., an investment in a debtor with a rating, such as 'investment grade', will pose a lower credit risk than an investment in a debtor with a low rating, such as 'speculative grade'). Changes in the quality of the debtor can have an impact on the credit risk.

#### Settlement risk

The risk that settlement via a payment or settlement system will not take place as expected because payment or delivery by a counterparty fails to take place or is not in accordance with the initial conditions. This risk exists to the extent that a Master Sub-Fund invests in regions where the financial markets are not yet well developed. This risk is limited in regions where the financial markets are well developed.

# Liquidity risk

The risk that a position cannot be liquidated in a timely manner at a reasonable price. This means that a Master Sub-Fund can only liquidate its assets at a less favourable price or after a certain period. The risk exists if the respective Master Sub-Fund invests in instruments for which there is no market or a market with only limited liquidity; for example, in the case of unlisted investments. OTC derivatives may also lack liquidity.

# Exchange or currency risk

The risk that the value of an investment will be affected by changes in exchange rates. This risk exists only to the extent that a Master Sub-Fund invests in assets that are denominated in a currency that develops differently from the reference currency of the respective Master Sub-Fund. For instance, a Master Sub-Fund denominated in EUR will not be exposed to any exchange risk when investing in bonds or equities denominated in EUR, but it will be exposed to an exchange risk when investing in bonds or equities denominated in USD.

The assessment of the exchange risk does not take account of the volatility of all currencies in which the assets in portfolio are denominated vis-à-vis the reference currency of the respective Master Sub-Fund.

# **Custody risk**

The risk of loss of assets held in custody as a result of insolvency, negligence or fraud on the part of the custodian or a sub-custodian.

#### Concentration risk

The risk relating to a large concentration of investments in specific assets or in specific markets. This means that the performance of those assets or markets will have a substantial impact on the value of the respective Master Sub-Fund's portfolio. The greater the diversification of the Master Sub-Fund's portfolio, the smaller the concentration risk. This risk will, for example, also be higher in more specialised markets (e.g., a specific region, sector or theme) than in widely diversified markets (e.g., a worldwide allocation).

#### Performance risk

The risk to return, including the fact that the risk may vary depending on the choices made by each Master Sub-Fund, as well as the existence or absence of, or restrictions upon, any third-party security. The risk depends in part on the market risk and on how active the management of the manager is.

# Capital risk

The risks to capital, including the potential risk of erosion due to the redemption of shares and the distribution of profit in excess of the investment return. This risk can be limited by loss-mitigation, capital-protection or capital- guarantee techniques.

# Flexibility risk

Inflexibility both within the product itself, including the risk of premature redemption, and constraints on switching to other providers. This risk can mean that a Master Sub-Fund is unable to take the desired actions at certain times. It can be higher in the case of UCITS or investments subject to restrictive laws or regulations.

#### Inflation risk

This risk is dependent on inflation. It applies, for example, to bonds with a long term to maturity and a fixed income.

# Environmental factors and legal risk

Uncertainty concerning the changeability of environmental factors (such as the tax regime or amendments to laws or regulations) that could affect how a Master Sub-Fund operates.

# Derivatives risk

The Master Sub-Funds may use derivative instruments not only for hedging, but also as an active investment

instrument. As a result, some of the abovementioned risks, e.g. concentration risk, can be adversely affected.

# Providing information related to sustainability in relation to financial products. Pre-contractual disclosure of information on the integration of sustainability risks

# Sustainability risk

The management company KBC Asset Management NV, operating through KBC Asset Management BFC (Branch of Foreign Company) - Bulgaria Branch (Management Company, KBC AM), understands the risk of sustainability as a risk in which the return on investment may be adversely affected from environmental, social or managerial risks.

Environmental risk is defined as the risk in which the return on investment may be adversely affected by environmental factors, including factors arising from climate change and factors arising from other environmental deterioration.

Social risk is defined as the risk that the return on investment may be adversely affected by social factors.

Management risk is defined as the risk that the return on investment may be adversely affected by management factors.

The nature of these risks varies over time:

- In the short term, the risk to sustainability is usually a risk of events. Such risks usually affect returns only if the event occurs. Examples of such events include an accident (resulting in litigation, for example, to compensate for environmental damage); court cases and penalties (for example, for non-compliance with social legislation); scandals (for example, when a company receives bad publicity because human rights are not respected throughout its supply chain or because the company's products do not meet the standards of the ESPG, which means "Environment, social policy and governance"). This type of sustainability risk is higher when the issuer is less rigorous on ESPG standards; and
- In the long term, sustainability risk refers to risks that may develop in the long term, such as: exposure to business activities that may be under pressure due to climate change (e.g., parts of the automotive industry); change of the customer product preferences (e.g., preference for more sustainable products); difficulties in recruiting; increased costs (for example, insurance companies facing claims due to changing weather conditions). As this risk develops in the long term, companies can mitigate it, for example, by changing their product offerings, improving their supply chains, and so on. However, it should be considered that the possibility of adaptation is not the same for all types of economic activity, so that certain activities are exposed to a bigger risk of sustainability than others (e.g., the oil sector). Therefore, the risk to sustainability also depends on the specific investment policy of the Master Sub-Funds. Unless otherwise is stated in respect of a Master Sub-Fund in Section 3 *Risk* of Part II "Information concerning the Sub-Funds" of this Prospectus in the information on its corresponding Sub-Fund, the level of risk to the sustainability of the Master Sub-Funds is low.

In its investment policy, the Management Company considers these sustainability risks by:

- I. defining an exclusion policy ("Exclusion Criteria") that applies to all funds and Beveks [Beleggingsvennootschap Met Veranderlijk Kapitaal "variable capital investment company"]. (More information can be found in Section F. "Social, ethical and environmental aspects" and on <a href="www.kbc.be/investment-legal-documents">www.kbc.be/investment-legal-documents</a> > General exclusion policies for conventional funds and responsible Investinf funds (RI); and
- II. application of additional criteria related to RI regarding particular Master Sub-Funds. These additional criteria regarding particular Master Sub-Funds are set out in subsection "Investment policy of the Master Sub-Fund" in section 2 "Investor Information" Part II, "Information concerning the Sub-Funds" of this Prospectus regarding each Sub-Fund that invests in shares of such Master Sub-Funds and on <a href="https://www.kbc.be/investment-legal-documents">www.kbc.be/investment-legal-documents</a> Exclusion policies for responsible investing funds.

Investment policy of the Management Company continuously evaluates underlying investments at the issuer level, but also (where applicable) at the asset allocation level and the regional or sectoral distribution level. These regular reviews consider the risk to sustainability as one of several elements that can affect returns. The RI Research Team assigns a ESPG risk rating to most of the companies included in the common indices and for a set of small and medium-sized companies based on data from a ESPG data provider. ESPG risk ratings are shared internally with portfolio managers and strategists so that the latter can use this as a factor in the investment decision-making process. More information on the positive selection methodology and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Investment policy for Responsible Investing funds and Overview of ESG Carbon intensity Sustainability targets.

# **Summary risk indicator**

In accordance with Regulation (EU) 1286/2014, Delegated Regulation (EU) 2017/653 as amended by Delegated Regulation (EU) 2021/2268, a summary risk indicator has been calculated per Sub-Fund. The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you. It is given as a figure between 1 and 7. The higher the figure, the greater the potential return, but also the more difficult it is to predict this

return. Losses are possible too. The lowest figure does not mean that the investment is entirely free of risk. However, it does indicate that, compared with the higher figures, this product will generally provide a lower, but more predictable return.

The summary risk indicator is assessed regularly and can therefore go up or down based on data from the past. Data from the past is not always a reliable indicator of future risk and return.

The most recent indicator can be found under the 'What are the risks and what could I get in return?' heading in the 'Key Information' document of each Sub-Fund.In addition to the summary risk indicator, the Management Company has assigned a product score to each of the Sub-Funds which corresponds to a specific risk profile of each of the Sub-Funds and its target investors. This risk profile can be found in the relevant section 3 "Risk" of Part II "Information concerning the Sub-Funds" of this Prospectus. The product score has been determined both on the basis of the volatility of the relevant Sub-Fund, as well as in consideration of other factors and the risks listed in Subsection *Risk Description* of this section. Therefore, it is possible that the synthetic risk and reward indicator of two or more of the Sub-Funds will be of the same value, but their risk profile, as listed in this Prospectus, will be different.

## Comparison between the risk profile and yield of the Sub-Funds and the Master Sub-Funds

As the Sub-Funds are feeder sub-funds which invests all or substantially all of their assets in shares issued by their corresponding Master Sub-Funds, may hold ancillary liquid assets (cash) up to an amount necessary for meeting their ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Funds' risk profile is identical to the risk profile of their corresponding Master Sub-Funds. The yield of the Sub-Funds is substantially the same as the yield of their corresponding Master Sub-Funds.

## H. Fees and charges regarding the Umbrella Fund

Fees and charges, divided according to whether they are paid by (1) the unitholders of Sub-Funds, and (2) the relevant Sub-Fund:

- 1. Fees and charges, paid by the unitholders of Sub-Funds\*:
  - a) One-off fees and charges: relevant for each Sub-Fund issue costs and redemption fee (see section "Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds" above) and section "Fees and charges" Part II "Information concerning the Sub-Funds" of this Prospectus for each of the Sub-Funds.
  - b) Ongoing/recurrent fees and charges: None
  - \* Investors owe other relevant applicable fees and expenses according to the Distributor's Tariff
- 2. Fees and charges, paid by the respective Sub-Fund
  - a) One-off fees and charges: Establishment expenses (see below)
  - Ongoing/recurrent fees and charges: (i) Management fee charged by KBC AM; (ii) Custodian fee charged by the Custodian; (iii) Other ongoing charges of the Sub-Funds; and (iv) Other ongoing charges of the Master Sub-Funds (see below)

## **Establishment Expenses**

All fees and expenses relating to the establishment of the Umbrella Fund and each of the Sub-Funds, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and Sub-Funds and the registration of the units for sale shall be borne by the respective Sub-Funds. Such fees and expenses do not exceed €55,000 (in words: fifty-five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years since the establishment of the Umbrella Fund or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

## **Ongoing/Recurrent fees and charges**

Each Sub-Fund will pay a management fee to KBC AM for the management of the respective Sub-Fund, which will be as follows:

Sub-Fund	Management Fee

UBB ExpertEase Defensive Balanced (EUR)	Max. 1.51% per year
ISIN BG9000004218	, ,
UBB ExpertEase Defensive Balanced (LEVA)	Max. 1.51% per year
ISIN BG9000003210	
UBB ExpertEase Defensive Tolerant (EUR)	Max. 1.51% per year
ISIN BG9000005215	
UBB ExpertEase Defensive Tolerant (LEVA)	Max. 1.51% per year
ISIN BG9000006213	
UBB ExpertEase Dynamic Balanced (EUR)	Max. 1.69% per year
ISIN BG9000008219	
UBB ExpertEase Dynamic Balanced (LEVA)	Max. 1.69% per year
ISIN BG9000007211	
UBB ExpertEase Dynamic Tolerant (EUR)	Max. 1.69% per year
ISIN BG9000009217	
UBB ExpertEase Dynamic Tolerant (LEVA)	Max. 1.69% per year
ISIN BG9000010215	
UBB ExpertEase Highly Dynamic Tolerant (EUR)	Max. 1.83% per year
ISIN BG9000011213	
UBB ExpertEase Highly Dynamic Tolerant (LEVA)	Max. 1.83% per year
ISIN BG9000012211	
UBB ExpertEase Defensive Conservative Responsible Investing	Max. 1.51% per year
ISIN BG9000006221	
UBB ExpertEase Defensive Balanced Responsible Investing	Max. 1.51% per year
ISIN BG9000005223	
UBB ExpertEase Dynamic Balanced Responsible Investing	Max. 1.69% per year
ISIN BG9000003228	
UBB ExpertEase Defensive Tolerant Responsible Investing	Max. 1.51% per year
ISIN BG9000004226	
UBB ExpertEase Dynamic Tolerant Responsible Investing	Max. 1.69% per year
ISIN BG9000002220	
UBB ExpertEase Highly Dynamic Tolerant Responsible Investing	Max. 1.83% per year
ISIN BG9000001222	

The management fee will be charged only on the portion of the assets of the relevant Sub-Fund, which is invested in financial instruments, other than units in the respective corresponding Master Sub-Fund.

However, potential investors must note that the Management Company, which is also the management company of the Master Umbrella Fund and the Master Sub-Funds, will charge a management fee on the assets of the respective Master Sub-Funds, which are acquired due to investments made by the Sub-Funds in the corresponding Master Sub-Funds. This management fee will be calculated on the basis of the average total net assets of the relevant Master Sub-Fund and will be in the same percentage as shown above in relation to the corresponding Sub-Funds. Therefore, this management fee will be indirectly borne by the respective Sub-Fund as a unitholder in the respective Master Sub-Fund, hence it will be ultimately at the expense of the unitholders in the Sub-Fund. Nonetheless, as mentioned above, the Management Company will not charge a management fee on the assets of the Sub-Funds, which are invested (i.e. being investments) in units of the corresponding Master Sub-Funds, thus avoiding double-charging of the management fee.

In addition, it should be noted that the Sub-Funds do not charge the Sub-Funds fees for issuing and repurchasing the shares of the Sub-Funds as a result of the investments made by the Sub-Funds in them.

Also, potential investors should keep in mind that there are no reimbursable fees or costs to be paid by the Sub-Funds in

connection with their investment in the Main Sub-Funds.

Each Sub-Fund will pay a depository service fee to the Depository in the total amount of BGN 2,820 (two thousand eight hundred and twenty levs) per year, where part of the fee due for the respective month will be paid on a monthly basis.

### Other ongoing charges of the Sub-Funds

In addition, each Sub-Fund will pay other ongoing charges, which will include:

- Remuneration for the servicing investment firms;
- · Audit fees;
- State fees;
- Supervision fees and other regulatory fees paid to the Financial Supervision Commission;
- Other operating fees and expenses;

These fees, calculated on the basis of the average amount of the total assets of the specific Sub-Fund, will not be in the total amount as follows:

Sub-Fund	Other charges
UBB ExpertEase Defensive Balanced (EUR) ISIN BG9000004218	Max. 0.25% per year
UBB ExpertEase Defensive Balanced (LEVA) ISIN BG9000003210	Max. 0.25% per year
UBB ExpertEase Defensive Tolerant (EUR) ISIN BG9000005215	Max. 0.25% per year
UBB ExpertEase Defensive Tolerant (LEVA) ISIN BG9000006213	Max. 0.25% per year
UBB ExpertEase Dynamic Balanced (EUR) ISIN BG9000008219	Max. 0.50% per year
UBB ExpertEase Dynamic Balanced (LEVA) ISIN BG9000007211	Max. 0.50% per year
UBB ExpertEase Dynamic Tolerant (EUR) ISIN BG9000009217	Max. 0.25% per year
UBB ExpertEase Dynamic Tolerant (LEVA) ISIN BG9000010215	Max. 0.25% per year
UBB ExpertEase Highly Dynamic Tolerant (EUR) ISIN BG9000011213	Max. 0.30% per year until the third anniversary of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Highly Dynamic Tolerant (LEVA) ISIN BG9000012211	Max. 0.60% per year until the third anniversary of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Defensive Conservative Responsible Investing ISIN BG9000006221	Max. 0.70% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Defensive Balanced Responsible Investing ISIN BG9000005223	Max. 1.40% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Dynamic Balanced Responsible Investing ISIN BG9000003228	Max. 0.70% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Defensive Tolerant Responsible Investing ISIN BG9000004226	Max. 1.40% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Dynamic Tolerant Responsible Investing ISIN BG9000002220	Max. 0.70% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter
UBB ExpertEase Highly Dynamic Tolerant Responsible Investing ISIN BG9000001222	Max. 1.40% per year until the third year after the establishment of the Sub-Fund and max. 0.10% thereafter

#### Other ongoing charges of the Master Sub-Funds

Investors should further take into account that the Master Sub-Funds bear other ongoing costs and charges in connection with their investments, which are charged on the assets of the respective Master Sub-Funds, acquired due to investments made by the Sub-Funds in the corresponding Master Sub-Funds. Therefore, these costs and charges will be indirectly borne by the respective Sub-Fund as shareholder in the respective Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

The ongoing costs and charges of the Master Sub-Funds, which will be indirectly borne by their corresponding Sub-Funds, include, in addition to management fees, operational and administrative expenses, as follows:

- Administration fee in the amount, listed in the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>;
- Custody fee in the amount, listed in the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>;
- Other costs and charges of the Master Sub-Funds (e.g. state fees, audit fees, etc.) estimated at an amount of up to 0.10% per year:
- Taxes, paid by the Master Sub-Funds in connection with their investments, where required by the respective
  applicable law;
- Subscription and redemption fees paid by the Master Sub-Funds in connection with their investment in other
  collective investment schemes made in accordance with their investment objectives and policies, the amount of
  which depends on the volume of operations made each year.
- Other costs, paid by the Master Sub-Funds in connection with their investment in other collective investment schemes made in accordance with their investment objectives and policies, the amount of which depends on the rules of such other collective investment schemes and the value of the Master Sub-Funds' assets, invested therein.

The precise amount of the ongoing costs and charges paid by each Master Sub-Funds can be found in the annual financial statements of the Master Umbrella Fund (please refer to subsection "Ways of receiving additional information regarding the Master Umbrella Fund, its Master Sub-Funds and the agreement between the Umbrella Fund and the Master Umbrella Fund" of section "Places where additional information regarding the Umbrella Fund and the Master Umbrella Fund can be obtained" in part C. Corporate Information).

Fees and charges, borne directly and indirectly by each Sub-Fund may not exceed 5% of the average annual net asset value of the respective Sub-Fund.

Investors can find the amount of the ongoing charges, taken by each Sub-Fund over a year, in the key information documents of each Sub-Funds.

### I. Tax treatment

This section of the Prospectus provides an outline of the general tax treatment applicable to the Umbrella Fund and the investment in its Sub-Funds. The information contained herein is not exhaustive and does not constitute, nor is it intended to be, any form of legal, tax or any other type of advice. Taxation depends on the specific circumstances of the investor and may change in the future.

Investors should seek assistance from their own legal, tax, financial or other consultants – as they deem necessary – in order to understand fully the tax treatment of the investment in units issued by funds such as the Sub-Funds.

#### Of the Umbrella Fund

According to article 174 of the Corporate Income Tax Act ("CITA"), collective investment schemes, whose units are allowed for public offering in the Republic of Bulgaria, such as the Umbrella Fund and its Sub-Funds are not subject to corporate tax.

#### Of the investor from transactions with units of the Sub-Funds

#### Taxation of resident natural persons

According to article 13 (1), item 3 of the Personal Income Tax Act ("PITA"), the income accruing from the disposition of financial instruments is non-taxable. This income includes income from transactions with units of collective investment schemes, entered into on a regulated market in Bulgaria or under the terms and according to the procedure for redemption of collective investment schemes, which have been admitted to public offering in Bulgaria or in another

Member State of the European Union, or in a state part of the European Economic Area, such as the Sub-Funds. This means that the income of unitholders resulting from redemption of their units in a Sub-Fund would be non-taxable.

#### Taxation of resident and non-resident legal entities

According to article 44 of the CITA resident legal entities and non-resident legal entities, which are doing busines from a permanent establishment or are accruing income from a source in the Republic of Bulgaria, in determining their tax financial result:

- shall debit (decrease) their accounting financial result with any profit from disposition of financial instruments (including units in the Sub-Funds), determined as a positive difference between the selling price and the documented cost of acquisition of the said financial instruments; and
- shall credit (increase) their accounting financial result with any loss from disposition of financial instruments (including units in the Sub-Funds), determined as a negative difference between the selling price and the documented cost of acquisition of the said financial instruments.

This profit/loss includes the result from transactions with units in collective investment schemes, entered into on a regulated market in Bulgaria or under the terms and according to the procedure for redemption of collective investment schemes, which have been admitted to public offering in Bulgaria or in another member state of the European Union ("EU"), or in a state part of the European Economic Area ("EEA"), such as the Sub-Funds. This means that the redemption of units in a Sub-Funds held by such unitholders would be tax neutral.

Under article 196 of CITA, any income from disposition of financial instruments, such as the redemption of unit in a Sub-Funds, shall not attract a tax withheld at source.

#### Taxation of non-resident natural persons

Under article 37 (1), item 12 and article 46 of PITA any income from transactions with units of a Sub-Fund (realized capital gain) received by individuals from third countries, other than residents of Bulgaria or persons established for tax purposes in an EU member state or another state part of the EEA, is subject to a final tax of 10% on the taxable income.

#### Other important information

Non-residents – unitholders of a Sub-Fund should note that when there is a Double Tax Treaty between the Republic of Bulgaria and the respective foreign country, whose resident is the recipient of income, the provisions of this agreement take precedence over Bulgarian domestic law. In such cases the Procedure for application of agreements for avoidance of the international double taxation of income and property in respect of foreign persons under Chapter 16, Section III of the Tax-Insurance Procedure Code is to be applied.

Natural persons – unitholders should note that the following types of unit acquisition are tax-exempt:

- acquisition by donation between lineal relatives and between spouses (article 44 (6) of the Local Tax and Fees Act
   ("LTFA")); and
- acquisition through inheritance by the surviving spouse and by lineal heirs (article 31 (2) of the LTFA).

## **J.Additional information**

#### Information on past performance

The Umbrella Fund does not provide information on the past performance of any of the Sub-Funds as there is insufficient data to give investors a useful indication thereof.

## Information on amendments to the Umbrella Fund Rules and changes in the investment policy of the Sub-Funds

Subject to compliance with the requirements of the applicable law, KBC AM is empowered to set and amend the Umbrella Fund Rules, as well as to change the risk profile and the investment goals, strategies, policy, and restrictions of each Sub-Fund set out in this Prospectus and in the Key Information Document of each Sub-Fund.

Information on used communication channels for subscription by the Sub-Funds of shares of the respective Master Sub-Funds of Horizon

Potential investors in units in the Sub-Funds should note that the Branch, acting on behalf of the Umbrella Fund and Sub-Funds, has entered into an agreement for transactions in financial instruments with United Bulgarian Bank AD, by virtue of which and through the intermediary services of the latter will be used more secure and fast communication

channels, to which United Bulgarian Bank AD has an access, for the submission of orders for subscription by the Sub-Funds of shares of the respective Master Sub-Funds of Horizon.

#### Information on the filing of complaints

Any investor has the right to file a complaint with the Branch, without paying a fee, against actions and omissions of "K.B.C. Asset Management N.V. - Branch", Bulgaria (universal successor of the Management Company "UBB Asset Management" EAD)" and the distributor "United Bulgarian Bank" AD.

Written complaints may be submitted:

- By post or on site at the Branch office with address gr. 1463 Sofia Blvd. Vitosha № 89B, UBB Millennium Centre, floor 6, every working day from 8.30 to 17.00;
- Electronically at ubbam@ubb.bg, or on the Branch's website via the contact form <a href="www.ubbam.bg">www.ubbam.bg</a> (Contact Us/Send Request).

The investor must provide identification and contact details - postal address, telephone number and email address, as well as a description of the nature of the complaint. If the complaint is made by proxy, a power of attorney must be attached.

The personal data submitted with the complaint shall be stored for a period of five years, subject to the provisions of Regulation (EC) 2016/679 and the Personal Data Protection Act.

Complaints shall be registered on the day of their receipt and, where received outside working hours, on the next working day. A reasoned written reply shall be sent to the complainant no later than 10 working days from the day of receipt of the complaint. Where a reply cannot be sent within the time limit referred to in the previous sentence, the Branch shall immediately inform the complainant and the Financial Supervision Authority of the reasons for the delay and indicate a time limit for the completion of the examination and the drafting of a reply. Where the complainant has lodged the

complaint electronically, the reply shall also be sent electronically, unless the complainant has expressly requested otherwise.

The response to the complaint shall contain information on the possibility of filing complaints with the Financial Supervision Commission and other state authorities, as well as the forms of out-of-court dispute resolution available to the investor in the Republic of Bulgaria.

- Sectoral Conciliation Commission for the settlement of disputes in the field of activities and services under Art. 5 (2) and (3) of MiFID Act and for activities and services under Art. 86 (1) and (2) of UCITS Act including the provision of financial services at a distance in these sectors, with address. 4A, Sofia 1000; tel. 02/9330 590; website: <a href="www.kzp.bg">www.kzp.bg</a>; e-mail: adr.finmarkets@kzp.bg.
- Financial Supervision Commission, 100 Sofia, 16 Budapeshta str.; Complaints Financial Supervision Commission (fsc.bg); e-mail: delovodstvo@fsc.bg.

The complaints procedure is available at: <a href="www.ubbam.bg">www.ubbam.bg</a> (About us/Documents). Investors can find a summary of the complaints procedure in the key information document of the investment product, in the section entitailed "How can I complain?".

## K. Prohibition of offer or sale

The units in the Umbrella Fund and Sub-Funds may not be publicly offered or sold in countries where they have not been registered with the local authorities.

## **European Union and European Economic Area**

KBC AM can market units of one or more of the Sub-Funds in a member state of the EU or a state part of the EEA, other than Bulgaria, only after conducting a notification (passportisation) procedure before the Financial Supervision Commission in accordance with the requirements of Chapter XI of the UCITS Directive as transposed in Part 2, Chapter 13, Section II of the ACISOUCIA.

#### **United States of America**

The units in Sub-Funds of the Umbrella Fund are not registered nor will they be registered based on the United States Securities Act of 1933, as amended from time to time. It is forbidden to offer, sell, transfer or deliver shares, directly or indirectly, in the United States of America or one of its territories or possessions or any area that is subject to its jurisdiction or to a US person, as defined in the aforementioned Securities Act. The Umbrella Fund and the Sub-Funds are not registered based on the United States Investment Company Act of 1940, as amended from time to time.

## L. Competent authority

The activities of the Umbrella Fund and its Sub-Funds are supervised by:

Financial Supervision Commission, FSC (in Bulgarian *Комисия за финансов надзор*) Budapest Str. 16 1000 Sofia

The activities of KBC AM and the Branch are supervised by:

Financial Services and Markets Authority (FSMA) Congresstraat 12-14 1000 Brussels

The activities of the Branch are subject to partial supervision in accordance with Chapter 12, Section VII of the ACISOUCIA by:

Financial Supervision Commission, FSC (in Bulgarian *Комисия за финансов надзор*) Budapest Str. 16 1000 Sofia

## M. Use of Benchmarks

All Sub-Funds are feeder sub-funds, which invest all or substantially all of their assets in shares from the Institutional F shares BG classe of the corresponding Master Sub-Funds. Therefore, the Sub-Funds do not have an index-tracking objective and are not managed with reference to a benchmark, meaning an index or a combination of different indices that serves as a reference point for measuring the performance and composition of a Sub-Fund's portfolio.

All Master Sub-Funds are actively managed, i.e. KBC AM has discretion over the composition of their portfolios, subject to the stated investment objectives and policy of each Master Sub-Fund. The portfolio management and the portfolio composition of the Master Sub-Funds do not reference a benchmark.

## II. Information concerning the Sub-Funds

## A. Information concerning the sub-fund UBB ExpertEase Defensive Balanced (EUR)

## 1. Basic details

#### **Name**

UBB ExpertEase Defensive Balanced (EUR), ISIN BG9000004218 (referred to hereinafter in this Section A as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated on 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of an amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, and Decision № 87-DF of the FSC dated 18.02.2021 approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is established for an unlimited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Balanced (referred to hereinafter in this Section A as the "Master Sub-Fund").

The Sub-Fund is denominated in EUR.

#### Conversion

The sub-fund has participated as a receiving fund in a transformation pursuant to the ACISOUCIA and the acts on its implementation, within which two collective investment schemes, namely DF "Raifeisen (Bulgaria) Active Protection in Euro" and DF "Raifeisen (Bulgaria) Global Mix", until the date of conversion, managed by UD "KBC Investment Management" EAD, with UIC 175015558, have contributed to the Sub-Fund. The conversion procedure was carried out after receiving permission from the FSC, objectified in Decision No. 21-DF/05.01.2023 and Decision No. 25-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have been acquired and transferred to the Sub-Fund, holders of units in Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have acquired units of the Sub-Fund in accordance with the specified exchange ratios and Raiffeisen Active Protection in Euro and Raiffeisen Global Mix have been discontinued, thus the assets of the Sub-Fund also include the assets and liabilities of Raiffeisen Active Protection in Euro and Raiffeisen Global Mix.

## Stock exchange listing

None.

### **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-

Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

## 2. Investment information

## **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in bonds.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Balanced; Currency EUR; ISIN BE6324083714	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 45% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice

versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay twice as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 40% and 80% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

## 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global mixed "balanced" fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as, review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	Moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	Low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	Low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	Moderate	since there are investments in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a real chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	Low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	Low	

Performance risk	Risks to return	Moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital	Moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	Low	
Inflation risk	Risk of inflation	Moderate	the bond component does not provide any protection against an increase in inflation.
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	Low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor, who puts the emphasis on security. The investor is prepared to accept a limited degree of risk and can afford to do without its money in the medium term. The investor has a bias for interest-bearing investments. The weighting of equity investments will be on the modest side and should preferably be made up of capital-protected instruments. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

# 4. Information concerning the subscription of units in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper, and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is EUR 10 (ten euros), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of EUR 10 (ten euros).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of EUR 10 (ten euros). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the

redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

## 5. Type of units and fees and charges

## Types and characteristics of the units issued by the Sub-Fund

	Type of units offered to the bublic	Currency for calculation of the asset value	the e net	ISIN code	Initial Subscription Price	
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dematerialised, registered, transferable units	EUR	BG9000004218	EUR 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Euro (EUR) and have nominal value of EUR 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Subscription	Redemption	Switching between sub-funds

Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### **Establishment Expenses**

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

## Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

## B. Information concerning the sub-fund UBB ExpertEase Defensive Balanced (LEVA)

## 1. Basic details

#### **Name**

UBB ExpertEase Defensive Balanced (LEVA), ISIN BG9000003210 (referred to hereinafter in this Section B as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated on 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, and Decision № 87-DF of the FSC dated 18.02.2021 approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is established for an unlimited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Balanced (referred to hereinafter in this Section B as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

#### Conversion

The sub-fund participated as a receiving fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which DF Raiffeisen (Bulgaria) Active Protection in BGN, until the date of the conversion, was managed by UD "KBC Investment Management" EAD, with UIC 175015558, has joined the Sub-Fund. The conversion procedure was carried out after receiving a permit from the FSC, objectified in Decision No. 22-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of Raiffeisen Active Protection in BGN have been acquired and transferred to the Sub-Fund, holders of units in Raiffeisen Active Protection in BGN has been terminated, thus, the assets of the Subfund include the assets and liabilities of Raiffeisen Active Protection in BGN has been terminated, thus, the assets of the Subfund include the assets and liabilities of Raiffeisen Active Protection in BGN.

## Stock exchange listing

None

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are collected from the assets of the Sub-Fund, thus are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

## 2. Investment information

### **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in bonds.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BGN class in Horizon KBC Defensive Balanced; Currency BGN; ISIN BE6324084720	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 45% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay twice as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile

markets. This part of the portfolio will ultimately amount to between 40% and 80% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - o S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

## 3. Risk

## Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global mixed "balanced" fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as, review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments in the Master Sub-Fund in securities that are denominated in currencies other than the Euro or the Bulgarian lev, there is a real chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.

Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	the bond component does not provide any protection against an increase in inflation.
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor, who puts the emphasis on security. The investor is prepared to accept a limited degree of risk and can afford to do without its money in the medium term. The investor has a bias for interest-bearing investments. The weighting of equity investments will be on the modest side and should preferably be made up of capital-protected instruments. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

## 4. Information concerning the subscription of units

## in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the

redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part 1 of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

## 5. Type of units and fees and charges

## Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price

dematerialised, registered, transferable units	BGN	BG9000003210	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Subscription	Redemption	Switching between sub-funds

Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

## Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund	Max. 1.51% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

## C. Information concerning the sub-fund UBB ExpertEase Defensive Tolerant (EUR)

## 1. Basic details

#### **Name**

UBB ExpertEase Defensive Tolerant (EUR), ISIN BG9000005215 (referred to hereinafter in this Section C as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, and Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is established for an unlimited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Tolerant (referred to hereinafter in this Section C as the "Master Sub-Fund").

The Sub-Fund is denominated in EUR.

## Stock exchange listing

None.

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a> and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

## No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

## 2. Investment information

## Sub-Fund's objective

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders by investing directly or indirectly in transferable securities. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### **Sub-fund's investment policy**

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Tolerant; Currency EUR; ISIN BE6324087756	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 45% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 40% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The

Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

## 3. Risk

## Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global mixed "balanced" fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this

Prospectus, as well as, review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	an issuer or a counterparty will moderate	
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments in the Master Sub-Fund in securities that are denominated in currencies other than the Euro or the Bulgarian lev, there is a real chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets		
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital mode		There is no capital protection.
Flexibility risk	Inflexibility both within the product and low constraints on switching to other providers		
Inflation risk	Risk of inflation	moderate	the bond component does not provide any protection against an increase in inflation.
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

## Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor, who puts the emphasis on security. The investor is prepared to accept a limited degree of risk and can afford to do without its money in the medium term. The investor has a bias for interest-bearing investments. The weighting of equity investments will be on the modest side and should preferably be made up of capital-protected instruments. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

## 4. Information concerning the subscription of units

## in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is EUR 10 (ten euros), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of EUR 10 (ten euros ).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of EUR 10 (ten euros). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

## 5. Type of units and fees and charges

## Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	EUR	BG9000005215	EUR 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Euro (EUR) and have a nominal value of EUR 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Fundsof this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

## Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

## D. Information concerning the sub-fund UBB ExpertEase Defensive Tolerant (LEVA)

## 1. Basic details

#### **Name**

UBB ExpertEase Defensive Tolerant (LEVA), ISIN BG9000006213 (referred to hereinafter in this Section D as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund,, and Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Tolerant (referred to hereinafter in this Section D as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

## Stock exchange listing

None.

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

## No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

## 2. Investment information

## **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Tolerant; Currency BGN; ISIN BE6324086741	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 45% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 40% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - o Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global mixed "balanced" fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the

master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as, review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.	
Credit risk	The risk that an issuer or a counterparty will default	the bond compone the Master Sub- invests primarily not exclusively- bonds with investment grade of Consequently, the that an issuer ca- longer meet	
Settlement risk	ment risk The risk that settlement of a transaction via a payment system will not take place as expected		
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	since there investments in Master Sub-Funct securities that denominated currencies other the Euro or Bulgarian lev, there real chance that value of an invest will be affected movements exchange rates.	
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets		
Performance risk	Risks to return	moderate the level of th reflects the volat the equity compor	
Capital risk	Risks to capital	moderate There is no capital protection.	
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	on risk Risk of inflation moderate the bond does not protection increase in		
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor, who puts the emphasis on security. The investor is prepared to accept a limited degree of risk and can afford to do without its money in the medium term. The investor has a bias for interest-bearing investments. The weighting of equity investments will be on the modest side and should preferably be made up of capital-protected instruments. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

# 4. Information concerning the subscription of units

## in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP)

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл). The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the

subscription and redemption order in section Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	BGN	BG9000006213	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10 . When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### **Establishment Expenses**

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# E. Information concerning the sub-fund UBB ExpertEase Dynamic Balanced (EUR)

### 1. Basic details

#### **Name**

UBB ExpertEase Dynamic Balanced (EUR), ISIN BG9000008219 (referred to hereinafter in this Section E as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, and Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Dynamic Balanced (referred to hereinafter in this Section E as the "Master Sub-Fund").

The Sub-Fund is denominated in EUR.

### Stock exchange listing

None.

### **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

### 2. Investment information

### Sub-Fund's objective

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Dynamic Balanced; Currency EUR; ISIN BE6324090784	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 70% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay twice as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 25% and 65% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this

Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:	
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.	
Credit risk	The risk that an issuer or a counterparty will default	the bond compor the Master Sut invests primarily not exclusively bonds with investment grade Consequently, th that an issuer colonger meet		
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low		
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low		
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments in the Master Sub-Fund in securities that are denominated in currencies other than the Euro or the Bulgarian Lev, there is a real chance that the value of an investment will be affected by movements in exchange rates.	
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low		
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets			
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.	
Capital risk	Risks to capital	moderate	There is no capital protection.	
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low		
Inflation risk	Risk of inflation	the bond component does not provide any protection against an increase in inflation.		
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low		

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

# 4. Information concerning the subscription of units

### in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order — without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is EUR 10 (ten euros), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл). The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of EUR 10 (ten euros).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of EUR 10 (ten euros). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules,

described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from par I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	EUR	BG9000008219	EUR 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Euro (EUR) and have a nominal value of EUR 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units

whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69 % per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.50% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# F. Information concerning the sub-fund UBB ExpertEase Dynamic Balanced (LEVA)

### 1. Basic details

#### **Name**

UBB ExpertEase Dynamic Balanced (LEVA), ISIN BG9000007211 (referred to hereinafter in this Section F as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund,, and Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Dynamic Balanced (referred to hereinafter in this Section F as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

### Stock exchange listing

None.

### **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

### **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Dynamic Balanced; Currency BGN; ISIN BE6324088762	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 70% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay twice as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 25% and 65% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund's

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:	
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	the prices and values moderate		
Credit risk	The risk that an issuer or a counterparty will default	Fund.  the bond comp the Master S invests primaril not exclusive bonds with investment grac Consequently, that an issuer longer mee obligations is than in an inv that consists bonds with investment grac If investors are about creditworthiness issuers of the bovalue of those can fall.		
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low		
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low		
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates			
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low		
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	ments in specific assets or in specific to return  moderate  moderate  the level of the reflects the volation the equity component to capital  moderate  moderate  There is no capital protection.		
Performance risk	Risks to return			
Capital risk	Risks to capital			
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers			
nflation risk	the compon n risk Risk of inflation moderate not proprotectic an incinflation.			

Environmental factors
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### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

# 4. Information concerning the subscription of units

### in the Sub-Fund

#### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order – without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device [for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan – SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл). The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	BGN	BG9000007211	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is

BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

ne-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute

discretion deems fair.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.50% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# G. Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant (EUR)

### 1. Basic details

#### **Name**

UBB ExpertEase Dynamic Tolerant (EUR), ISIN BG9000009217 (referred to hereinafter in this Section G as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund,, and Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Dynamic Tolerant (referred to hereinafter in this Section G as the "Master Sub-Fund").

The Sub-Fund is denominated in EUR.

### Stock exchange listing

None.

### Important information

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

### Sub-Fund's objective

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Dynamic Tolerant; Currency EUR; ISIN BE6324092806	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 70% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 35% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - o Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus below, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily – but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments in the Master Sub-Fund in securities that are denominated in currencies other than the Euro or the Bulgarian Lev, there is a real chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets		
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	the bond component does not provide any protection against an increase in inflation.

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

# 4. Information concerning the subscription of units

### in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order – without paying additional costs, (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription

order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is EUR 10 (ten euros), divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

#### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of EUR 10 (ten euros ).

#### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of EUR 10 (ten euros). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered

irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the ne asset value		Initial Subscription Price
dematerialised, registered, transferable units	EUR	BG9000009217	EUR 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Euro (EUR) and have a nominal value of EUR 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for

the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

#### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other

period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# H.Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant (LEVA)

### 1. Basic details

#### **Name**

UBB ExpertEase Dynamic Tolerant (LEVA), ISIN BG9000010215 (referred to hereinafter in this Section H as the "Sub-Fund")

#### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

#### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund — Horizon KBC Dynamic Tolerant (referred to hereinafter in this Section H as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

### Stock exchange listing

None.

### **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

### Sub-Fund's objective

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Dynamic Tolerant; Currency BGN; ISIN BE6324091790	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

#### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 70% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 35% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

# Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the

master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily – but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments in the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a real chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	the bond component does not provide any protection against an increase in inflation.
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

## Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

# 4. Information concerning the subscription of units

# in the Sub-Fund

## How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

## Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order – without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva), divided by the

issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

## Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

## Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

## Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed

after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies)

# 5. Type of units and fees and charges

# Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	BGN	BG9000010215	BGN 10

## General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

## **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

## Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

## **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.25% per year

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# I. Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant (EUR)

## 1. Basic details

## **Name**

UBB ExpertEase Highly Dynamic Tolerant (EUR), ISIN BG9000011213 (referred to hereinafter in this Section I as the "Sub-Fund")

## Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

## Life

The Sub-Fund is not established for a limited period of time.

## **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Highly Dynamic Tolerant (referred to hereinafter in this Section I as the "Master Sub-Fund").

The Sub-Fund is denominated in EUR.

# Stock exchange listing

None.

# **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

# No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

# **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

## Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Highly Dynamic Tolerant; Currency EUR; ISIN BE6324094828	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

## Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 75% for the stock component and 25% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 90% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 30% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

# Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the

master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily – but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	high	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	low	
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

## Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 6 years.

# 4. Information concerning the subscription of units

## in the Sub-Fund

## How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

## Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order — without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device [for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is EUR 10 (ten euros, divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than

the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

### Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected. The investor should have at least one payment account opened with the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of EUR 10 (ten euros).

## Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of EUR 10 (ten euros). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

# Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	EUR	BG9000011213	EUR 10

### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Euro (EUR) and have a nominal value of EUR 10 each.

## **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is EUR 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

## Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

## **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute discretion deems fair.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.83% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.30 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter.

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.83% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# J. Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant (LEVA)

# 1. Basic details

## **Name**

UBB ExpertEase Highly Dynamic Tolerant (LEVA), ISIN BG9000012211 (referred to hereinafter in this Section J as the "Sub-Fund")

## Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 11.08.2020, as well as decisions dated 20.11.2020 and 11.01.2021 for the approval of amended and supplemented versions of the prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 87-DF of the FSC dated 18.02.2021, approving the establishment and management of the Umbrella Fund and its sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 18.02.2021, which is the date of registration of the Umbrella Fund and its sub-funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

#### Life

The Sub-Fund is not established for a limited period of time.

## **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Highly Dynamic Tolerant (referred to hereinafter in this Section J as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

# Stock exchange listing

None.

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on group KBC's website under <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a> and a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

# No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank account and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit account. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

## **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

## Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Highly Dynamic Tolerant; Currency BGN; ISIN BE6324093812	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with Art. 38, para. 1, items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

## Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund will be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market).

The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 75% for the stock component and 25% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, as illustrated below.

Therefore, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component can amount to a maximum of 90% of the Master Sub-Fund. When applying KBC AM's investment view, an analysis is made of the financial and economic developments and prospects for specific regions, sectors and themes. If conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the best-performing of these two classes and sell assets in the worst-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as much attention to the downside risk as to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio will ultimately amount to between 5% and 30% of the assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

The stock component is invested in a worldwide selection of shares that may come from any region, sector or theme.

The bond component is composed as follows:

Some of the assets are invested in bonds and debt securities issued by both companies and governments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt

#### instruments:

- in securities that have an investment grade (minimum BBB-/Baa3 long term, A3/F3/P3 short term) rating of at least one of the following rating agencies:
  - Moody's (Moody's Investors Service);
  - S&P (Standard & Poor's, a Division of the McGraw-Hill Companies);
  - o Fitch (Fitch Ratings), and/or
- in money market instruments whose issuer has been given an investment grade rating of 1 of the abovementioned rating agencies.

In addition, the Master Sub-Fund can invest up to 50% of the assets invested in bonds and debt instruments

- in securities that have a lower rating (or money market instruments whose issuer has a lower rating)
- in securities for which no credit rating of any of the above-mentioned agencies is available (or money market instruments whose issuer does not have a rating of one of above mentioned agencies).

All maturities are taken into consideration when selecting the bonds and debt instruments.

The Master Sub-Fund will invest primarily in units of undertakings for collective investment managed by a member of the KBC group based on criteria such as how transparent the investment policy of those undertakings for collective investment is and whether or not their strategy is in line with the Master Sub-Fund's investment strategy.

Derivatives can be used both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of security (collateral) in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties is governed by standard international agreements.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, either fully or partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

# Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions (in futures) to hedge market risk given the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and their fulfilment in the Master Sub-Fund, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take note of the risk factors set out in heading Risks resulting from the master-feeder structure from Section *General information on the risk profile of the Sub-Funds* in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are *indirectly* exposed as a result of the Sub-Fund's investment in the Master Sub-Fund's

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	high	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks to return	moderate	the level of the risk reflects the volatility of the equity component.
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both within the product and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	low	

Environmental factors  Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	
----------------------------------------------------------------------------------------------------------------	-----	--

## Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor, who targets a potentially higher return by allocating its investments near enough evenly between shares and interest-bearing products. Under normal market conditions, this allocation represents for such investor a good balance between risk and return. However, this investor is also aware that prices can fall. Therefore, trying to achieve a higher return entails taking on additional risk. Dynamic investors can do without some of their assets for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 6 years.

# 4. Information concerning the subscription of units

# in the Sub-Fund

## How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

## Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device [for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the subscription

order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva, divided by the issue price per 1 unit. The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order, to which the procedure applicable to confirmation of executed orders for issuance of units shall apply.

## Systematic investment plans

If the investor entered into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. It may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution is collected.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

## Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Umbrella Fund and the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and therefore after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section Initial Subscription of Part I of this Prospectus.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of an investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents (annexes), attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, when the investor has requested a number of units for redemption, the number of units requested in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day (day T), after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended in the manner and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period, are not executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order in compliance with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund and its Sub-Funds. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit for a given business day is calculated as to the net asset value per unit for the preceding business day is added the issuance fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus.

The redemption price per unit for a given business day is calculated as the net asset value per unit for the preceding business day minus the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges chargeable to the investor* of Section 5 *Type of units and fees and charges* from part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of the Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted) and on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies).

# 5. Type of units and fees and charges

# Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialised, registered, transferable units	BGN	BG9000012211	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the Sub-Fund's assets.

The units of each Sub-Fund are freely transferable and are issued in dematerialised (registered) form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for

the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Funds are issued in a dematerialised (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

## Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

## **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

If you redeem units from KBC funds and subscribe for units in this sub-fund, you will not be charged a subscription fee.

#### Establishment Expenses

All fees and expenses relating to the establishment of the Umbrella Fund and the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorisation of the establishment and management of the Umbrella Fund and the Sub-Fund and the registration of the units for sale will be borne by all Sub-Funds of the Umbrella Fund. Such fees and expenses are estimated not to exceed €55,000 (in words: fifty five thousand euros) (exclusive of VAT, if any) and may be amortised over the first 5 (five) years or such other period as the Management Company may determine and in such manner as the Management Company in its absolute

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.83% per year
Custodian Fee	Per year	BGN 2 820 (in words: two thousand eight hundred and twenty leva), whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.60% per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.83% of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges paid by the Master Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# K. Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing

# 1. Basic details

## **Name**

UBB ExpertEase Defensive Conservative Responsible Investing, ISIN BG9000006221 (referred to hereinafter in this Section K as the "**Sub-Fund**")

## Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MF of the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Fund in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

## Life

The Sub-Fund is established for an unlimited period of time.

## **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invests by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Conservative Responsible Investing (referred to hereinafter in this Section K as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

# Stock exchange listing

None.

# **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on the website of the KBC Group on the following address: <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an

investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

## No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is therefore not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

## **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in bonds.

## Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding orders in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Conservative Responsible Investing; Currency Euro; ISIN BE6331692176	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38 (1), items 7 and 8 and article 42 and 43 of ACISOUCIA	

## Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments, including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market. The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 45% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of its assets to buy additional assets in the better-performing of these two classes and sell assets in the worse -performing one.

The managers of the Master Sub-Fund pay two-and-a-half times more attention to the downside risk compared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be

converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio may ultimately amount to between 60% and 95% of all assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target;
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and
  - o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - o security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: https://www.ubbam.bg/en/expertease, section "Documents", Sustainability-related disclosures.

#### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### **Potential Exceptions**

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase ;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer;
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and/or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and/or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and/or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

#### Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus will be updated.

Required disclaimer J.P. Morgan:

Information has been obtained from sources believed to be reliable, but J.P. Morgan does not guarantee its completeness or accuracy. The Index is used by permission. The Index may not be copied, used or distributed without the prior written permission of J.P. Morgan. Copyright 201(7), J.P. Morgan chase & Co. All rights reserved.

#### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 2 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

# Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global balanced fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account of the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component

Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	The bond component does not provide protection against the risk of inflation
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

## Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor who focuses on security. The investor is willing to accept a limited degree of risk and can afford to invest his funds in the medium term. The investor has a preference for interest-bearing investments. Investment in shares should be insignificant and should preferably consist of instruments with capital protection. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

# 4. Information concerning the subscription and

# redemption of units in the Sub-Fund

## How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favour of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

## Systematic investment plans

If the investor enters into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions, against subscription of a corresponding number of shares in it. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

## Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

## Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection *One-off fees and charges charged to the investors* of Section 3. *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3. *Type of fees and charges related to the Umbrella Fund* of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

# Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T shall be published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

# 5. Type of unit and fees and charges

# Types and characteristics of the units issued by the Sub-Fund

Type of units of public	 Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price

dematerialized, registered, transferable units	BGN	BG900006221	BGN 10
transierable units			

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialised form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Fund may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at his expense, Central Depository AD can issue a certificate for the units owned by such investor.

## Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

## Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by the Sub-Funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

## Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-

Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51 % per year
Custodian Fee	Per year	2820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.70 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# L. Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing

# 1. Basic details

### **Name**

UBB ExpertEase Defensive Balanced Responsible Investing, ISIN BG9000005223 (referred to hereinafter in this Section L as the "**Sub-Fund**")

### Date of establishment

The Sub-Fund is established (organized) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MFof the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

### Life

The Sub-Fund is established for an unlimited period of time.

### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invests by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Defensive Balanced Responsible Investing (referred to hereinafter in this Section L as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

## Stock exchange listing

None.

## Important information

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on the website of the KBC Group on the following address: <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

## **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in bonds.

## Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding orders in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Balanced Responsible Investing; Currency Euro; ISIN BE6331693182	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38, (1), items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market). The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 45% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the better-performing of these two classes and sell assets in the worse-performing one.

The managers of the Master Sub-Fund pay two times as more attention to the downside risk compared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio may ultimately amount to between 40% and 80% of all assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the

pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

#### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

#### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target;
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and
  - o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - o security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: https://www.ubbam.bg/en/expertease, section "Documents", Sustainability-related disclosures.

### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the

Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

#### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### **Potential Exceptions**

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase ;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer;
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and/or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and/or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and/or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and / or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

### Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus will be updated.

Required disclaimer J.P. Morgan:

Information has been obtained from sources believed to be reliable, but J.P. Morgan does not guarantee its completeness or accuracy. The Index is used by permission. The Index may not be copied, used or distributed without the prior written permission of J.P. Morgan. Copyright 201(7), J.P. Morgan chase & Co. All rights reserved.

#### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related disclosures>General exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 3 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialized in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

## Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely defensive. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian

# Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global balanced fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account of the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarizes the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on	low	

	switching to other providers		
Inflation risk	Risk of inflation	moderate	The bond component does not provide protection against the risk of inflation
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor who focuses on security. The investor is willing to accept a limited degree of risk and can afford to invest his funds in the medium term. The investor has a preference for interest-bearing investments. Investment in shares should be insignificant and should preferably consist of instruments with capital protection. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

# 4. Information concerning the subscription and

# redemption of units in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device [for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favor of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

### Systematic investment plans

If the investor enteres into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions, against subscription of a corresponding number of shares in it. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the

number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e., the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T shall be published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor — <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

# 5. Type of unit and fees and charges

## Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialized, registered, transferable units	BGN	BG9000005223	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialized form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Fund may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at his expense, Central Depository AD can issue a certificate for the units owned by such investor.

### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

### Dividend payment

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

### One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51 % per year
Custodian Fee	Per year	2820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.70 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# M. Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing

# 1. Basic details

### **Name**

UBB ExpertEase Dynamic Balanced Responsible Investing, ISIN BG9000003228 (referred to hereinafter in this Section M as the "**Sub-Fund**")

### Date of establishment

The Sub-Fund is established (organized) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MF of the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Funds in the register under article 30 (1), item 4 of the Financial Supervision Commission Act

### Life

The Sub-Fund is established for an unlimited period of time.

### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invest by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Dynamic Balanced Responsible Investing (referred to hereinafter in this Section M as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

### Conversion

The sub-fund participated as a receiving fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which the DF Raiffeisen (Bulgaria) Global Balanced Fund, until the date of the conversion, was managed by the UD "KBC Investment Management" EAD, with UIC 175015558, has joined the Sub-Fund. The conversion procedure was carried out after receiving permission from the FSC, objectified in Decision No. 23-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all the assets and liabilities of the Raiffeisen Global Balanced Fund have been acquired and transferred to the Sub-Fund, the holders of units in the Raiffeisen Global Balanced Fund have acquired units of the Sub-Fund in accordance with the specified exchange ratio and the Raiffeisen Global Balanced Fund has been terminated, whereby thus the assets of the Sub-Fund also include the assets and liabilities of the Raiffeisen Global Balanced Fund.

## Stock exchange listing

None.

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available the website of KBC Group on the following address: <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is therefore not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

## 2. Investment infromation

### **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding orders in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Dynamic Balanced Responsible Investing; Currency Euro; ISIN BE6331694198	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38, (1), items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market). The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 70% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile

or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the its assets to buy additional assets in the better-performing of these two classes and sell assets in the worse-performing one.

The managers of the Master Sub-Fund pay two times more attention to the downside risk compared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio may ultimately amount to between 25% and 65% of all assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target:
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and
  - o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - o security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: https://www.ubbam.bg/en/expertease, section "Documents", Sustainability-related disclosures.

#### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments

are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

#### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### **Potential Exceptions**

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase ;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer;
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and / or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and / or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and / or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and / or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

### Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally

sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus will be updated.

### Required disclaimer J.P. Morgan:

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### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related disclosures>General exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 5 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

## 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.

Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	The bond component does not provide protection against the risk of infaltion
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor who is interested in a potentially higher return by distributing his investments evenly between stocks and interest-bearing financial instruments. Under normal market conditions, for this type of investor, this distribution represents a good balance between risk and return. However, this type of investors are aware that prices may fall. Therefore, striving for higher returns requires taking additional risk. Dynamic investors can afford to invest their money for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

# 4. Information concerning the subscription and

# redemption of units in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favor of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue

price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

### Systematic investment plans

If the investor enters into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central

#### Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T shall be published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor — <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

# 5. Type of unit and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialized, registered, transferable units	BGN	BG9000003228	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialised form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Fund may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at its expense, Central Depository AD can issue a certificate for the units owned by such investor.

### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by the Sub-Funds of the Umbrella Fund in Part I, Section Description of the types and characteristics of the units in the Umbrella Fund and Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-

### Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

# Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69 % per year
Custodian Fee	Per year	2820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.70 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

# N. Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing

## 1. Basic details

### **Name**

UBB ExpertEase Defensive Tolerant Responsible Investing, ISIN BG9000004226 (referred to hereinafter in this Section N as the "**Sub-Fund**")

### Date of establishment

The Sub-Fund is established (organized) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MF of the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Fund in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

### Life

The Sub-Fund is established for an unlimited period of time.

### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invests by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund — Horizon KBC Defensive Tolerant Responsible Investing (referred to hereinafter in this Section N as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

## Stock exchange listing

None.

## **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on the website of the KBC Group on the following address: <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an

investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is not therefore protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

# 2. Investment information

### **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Defensive Tolerant Responsible Investing; Currency Euro; ISIN BE6331695203	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38, (1), items 7 and 8 and Art. 42 and 43 of ACISOUCIA	

### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments, including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market. The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 30% for the stock component and 70% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 45% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of the portfolio to buy additional assets in the better-performing of these two classes and sell assets in the worse-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times more attention to the downside risk compared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain

and/or volatile markets. This part of the portfolio may ultimately amount to between 5% and 40% of all assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target;
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures .

#### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and

o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - o security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: https://www.ubbam.bg/en/expertease, section "Documents", Sustainability-related disclosures.

#### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments

of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### Potential Exceptions

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase ;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer;
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and / or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and / or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and / or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and / or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus

will be updated.

Required disclaimer J.P. Morgan:

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### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related disclosures>general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 4 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

# 3. Risk

## Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global balanced fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component

Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	The bond component does not provide protection against the risk of infaltion
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Defensive profile.

This means an investor who focuses on security. The investor is willing to accept a limited degree of risk and can afford to invest his funds in the medium term. The investor has a preference for interest-bearing investments. Investment in shares should be insignificant and should preferably consist of instruments with capital protection. Effective diversification remains important.

The recommended holding period of an investment in this Sub-Fund is minimum 3 years.

# 4. Information concerning the subscription and

# redemption of units in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favor of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

### Systematic investment plans

If the investor enters into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting

amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

## Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T shall be published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor — <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

# 5. Type of unit and fees and charges

# Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public Currency for the IS calculation of the net asset value	ISIN code	Initial Subscription Price
--------------------------------------------------------------------------------------------	-----------	----------------------------

dematerialized, registered, transferable	BGN	BG9000004226	BGN 10
units			

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialised form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at his expense, Central Depository AD can issue a certificate for the units owned by such investor.

### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by the Sub-Funds of the Umbrella Fund in Part I, Section Rights provided by the units in the Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.51 % per year
Custodian Fee	Per year	2820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.70 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.51 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

## O. Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing

### 1. Basic details

### **Name**

UBB ExpertEase Dynamic Tolerant Responsible Investing, ISIN BG9000002220 (referred to hereinafter in this Section O as the "**Sub-Fund**")

### **Date of establishment**

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MF of the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Fund in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

### Life

The Sub-Fund is established for an unlimited period of time.

### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invests by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Dynamic Tolerant Responsible Investing (referred to hereinafter in this Section O as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

### Stock exchange listing

None.

### Important information

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, available which is on the website of the **KBC** Gropup on the following https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is therefore not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

### 2. Investment information

### **Sub-Fund's objective**

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding orders in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's
	assets
Institutional F shares BG class in Horizon KBC Dynamic Tolerant Responsible Investing; Currency Euro; ISIN BE6331696219	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38, (1), items 7 and 8 and article 42 and 43 of ACISOUCIA	-

### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market. The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 55% for the stock component and 45% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 70% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of its assets to buy additional assets in the better-performing of these two classes and sell assets in the worse-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as more attention to the downside risk comared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio may ultimately amount to between 5% and 35% of all assets. This

limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

#### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target;
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and
  - o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

#### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### **Potential Exceptions**

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase ;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer:
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and / or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and / or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and / or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and / or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

### Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus will be updated.

Required disclaimer J.P. Morgan:

Information has been obtained from sources believed to be reliable, but J.P. Morgan does not guarantee its completeness or accuracy. The Index is used by permission. The Index may not be copied, used or distributed without the prior written permission of J.P. Morgan. Copyright 201(7), J.P. Morgan chase & Co. All rights reserved.

### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related disclosures>general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 6 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	
Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	moderate	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	

Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	moderate	The bond component does not provide protection against the risk of infaltion
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor who is interested in a potentially higher return by distributing his investments evenly between stocks and interest-bearing financial instruments. Under normal market conditions, for this type of investor, this distribution represents a good balance between risk and return. However, this type of investors are aware that prices may fall. Therefore, striving for higher returns requires taking additional risk. Dynamic investors can afford to invest their money for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 5 years.

## 4. Information concerning the subscription and

## redemption of units in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

#### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favor of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

### Systematic investment plans

If the investor enteres into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period. If for 3 (three) consecutive periods the investor did not provide the selected amount for investment on his account, the respective SIP Agreement is automatically terminated.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

#### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-

Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection One-off fees and charges charged to the investors of Section 3. Type of fees and charges related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

## 5. Type of unit and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialized, registered, transferable units	BGN	BG9000002220	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialised form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Funds may issue only units or fractions of units whose issue price has been paid in full.

#### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at his expense, Central Depository AD can issue a certificate for the units owned by such investor.

#### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by the Sub-Funds of the Umbrella Fund in Part I, Section Rights provided by the units in the Sub-Funds of this Prospectus.

### Fees and charges

One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%

Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

## Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.69 % per year
Custodian Fee	Per year	2 820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 0.70 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.69 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges", part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

## P. Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing

### 1. Basic details

### **Name**

UBB ExpertEase Highly Dynamic Tolerant Responsible Investing, ISIN BG9000001222 (referred to hereinafter in this Section P as the "**Sub-Fund**")

### Date of establishment

The Sub-Fund is established (organised) in accordance with the ACISOUCIA and its delegated legislation by virtue of decision of KBC AM dated 16.11.2021 and 08.02.2022, for the approval of amended and supplemented versions of the Prospectus and amended and supplemented rules and other documents of the Umbrella Fund, Decision № 164-MF of the FSC dated 08.03.2022, approving the establishment and management of the sub-funds by KBC AM.

The Sub-Fund is deemed established in the Republic of Bulgaria on 08.03.2022, which is the date of registration of the Sub-Fund in the register under article 30 (1), item 4 of the Financial Supervision Commission Act.

### Life

The Sub-Fund is established for an unlimited period of time.

### **Status**

The Sub-Fund is an investment compartment of the Umbrella Fund established in accordance with the ACISOUCIA. The Umbrella Fund is a feeder UCITS within the meaning of article 67 of the ACISOUCIA and the Sub-Fund is a feeder sub-fund, which invests by way of derogation from article 4 (1), item 1, articles 38, 45, 48 and article 49 (2), item 3 of the ACISOUCIA, at least 85% of its assets in Horizon's Master Sub-Fund – Horizon KBC Highly Dynamic Tolerant Responsible Investing (referred to hereinafter in this Section P as the "Master Sub-Fund").

The Sub-Fund is denominated in BGN.

#### Conversion

The sub-fund participated as a receiving fund in a conversion in accordance with the ACISOUCIA and the acts on its implementation, within which the DF Raiffeisen (Bulgaria) Fund Global Growth, until the date of the conversion, was managed by the UD "KBC Investment Management" EAD, with UIC 175015558, has joined the Sub-Fund. The conversion procedure was carried out after receiving a permit from the FSC, objectified in Decision No. 24-DF/05.01.2023 of the FSC, with an effective date of conversion 29.03.2023. As a result of the conversion, all assets and liabilities of the DF Raiffeisen Global Growth have been acquired and transferred to the Sub-Fund, the holders of units in the DF Raiffeisen Global Growth have acquired units of the Sub-Fund in accordance with the specified exchange ratio and the DF Raiffeisen Global Growth has been terminated, thereby thus the assets of the Sub-Fund also include the assets and liabilities of DF Raiffeisen Global Growth.

### Stock exchange listing

None.

### **Important information**

In accordance with the applicable legislation, the Sub-Fund is a feeder sub-fund which invests at least 85% of its assets in the Master Sub-Fund on a permanent basis.

An investment in the Sub-Fund may not be appropriate for all investors. Investors should read and consider the section "General information on the risk profile of the Sub-Funds" above and Section 3 "Risk" below before investing in the Sub-Fund. Investors should also read and consider the prospectus for the Master Sub-Fund, which is available on the website of the KBC Group on the following address: <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb">https://www.kbc.be/retail/en/legal-information/investment-legal-documents.html?zone=breadcrumb</a>, a copy of which may be obtained in all branches of the Distributor during their normal business hours.

Investors should note that the fees and expenses of the Sub-Fund are collected from the assets of the Sub-Fund and that the management fee for the Master Sub - Fund is collected from its assets, so that, given that the Sub-Fund will be a shareholder in the Master Sub-Fund, they are indirectly borne by the unitholders in the Sub-Fund. There is no guarantee that the Sub-Fund will generate sufficient income from its investments in order to discharge these fees and expenses incurred and this could have the effect of lowering the capital value of an investment in the Sub-Fund. Thus, upon redemption of units in the Sub-Fund the unitholders may not receive back the full amount they invested.

### No investment guarantee

Investment in the Sub-Fund is not in the nature of a deposit in a bank and is therefore not protected by any government, government agency or other guarantee scheme which may be available to protect the holder of a bank deposit. Any investment in the Sub-Fund is subject to fluctuations in value.

### 2. Investment information

### Sub-Fund's objective

The investment objective of the Sub-Fund is to invest at least 85% of its assets in the Master Sub-Fund, in order to provide investors with an opportunity to invest in a well-diversified master UCITS with a large investor base, high net asset value and a global outlook. This allows investors to benefit from professional asset management based in a leading European market and cost-lowering economies of scale.

The investment objective of the Master Sub-Fund is to generate the highest possible return for its shareholders in accordance with its investment policy. This is reflected in its pursuit of capital gains and income. To this end, the assets of the Master Sub-Fund are invested, either directly or indirectly via correlated financial instruments, primarily in shares.

### Sub-fund's investment policy

All or substantially all funds attracted by the Sub-Fund shall be invested in shares of the Master Sub-Fund. The Sub-Fund may hold ancillary liquid assets (cash) up to an amount necessary for the Sub-Fund to fulfil redemption orders submitted by investors and to meet other ongoing expenses and may have limited derivative positions (in futures) to hedge market risk arising from the timing difference between the fulfilment of redemption and subscription orders in the Sub-Fund and fulfilment of the corresponding orders in the Master Sub-Fund. The portfolio of the Sub-Fund shall be structured as follows:

Asset class	Percentage of Sub-Fund's assets
Institutional F shares BG class in Horizon KBC Highly Dynamic Tolerant Responsible Investing; Currency Euro; ISIN BE6331698231	At least 85%
Cash in bank	Up to 15%
Derivatives in accordance with article 38, (1), items 7 and 8 and article 42 and 43 of ACISOUCIA	

### Investment policy of the Master Sub-Fund

Due to the composition of the Sub-Fund's portfolio, its performance depends substantially on the investment policy of the Master Sub-Fund. It is not intended that the Sub-Fund will make any direct investments and all or substantially all monies received by the Sub-Fund are to be invested in the Master Sub-Fund.

The Master Sub-Fund invests directly or indirectly in various asset classes, such as shares and/or share-related investments (the "stock component"), bonds and/or bond-related investments (the "bond component"), money market instruments, cash and cash equivalents, and/or alternative investments (including indirectly in real estate, through investments in liquid financial instruments, for example in units or shares of real estate investment funds (including real estate investment trusts and other funds for investments in real estate) as well as financial instruments that are linked to price movements on the commodity market). The Master Sub-Fund may borrow up to 10% of its net assets, insofar as these are short-term borrowings aimed at solving temporary liquidity problems.

The target allocation of the Master Sub-Funds assets is 75% for the stock component and 25% for the bond component. This allocation may be significantly deviated from in line with the investment view of KBC AM, according

to which, the Master Sub-Fund may invest a sizeable portion of its assets in asset classes that are not included in the target allocation (such as money market instruments and cash). The stock component may amount to a maximum of 90% of the Master Sub-Fund's assets.

When applying KBC AM's investment view, an analysis shall be made of the financial and economic developments and prospects for specific regions, sectors and themes. If the conditions on the financial markets are uncertain, volatile or both, part of the portfolio can also be converted into investments with a lower level of risk (such as money market instruments and cash). If the stock component outperforms the bond component, or vice versa, the managers of the Master Sub-Fund can likewise use part of its assets to buy additional assets in the better-performing of these two classes and sell assets in the worse-performing one.

The managers of the Master Sub-Fund pay one-and-a-half times as more attention to the downside risk compared to the upside potential. The more attention that is paid to downside risk, the larger the portion of the portfolio that can be converted into investments with a lower level of risk, such as cash and money market instruments, in times of uncertain and/or volatile markets. This part of the portfolio may ultimately amount to between 5% and 30% of all assets. This limit is indicative and may be reviewed annually based on the long-term trend of the financial markets. However, under certain market conditions, the Master Sub-Fund's assets will not be invested in these asset classes in accordance with the pre-set target allocation.

Within the above limits, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology. This approach will be gradually implemented in the portfolio, starting 2 September 2022. KBC Asset Management NV has a team of specialist researchers responsible for this dualistic approach. They are assisted by an independent advisory board (the "Responsible Investing Advisory Board") comprised of up to twelve persons, who are not affiliated to KBC Asset Management NV, and whose sole responsibility is to supervise the dualistic approach and activities of the specialist researchers. The secretariat of the advisory board is handled by a representative of KBC Asset Management NV. Moreover, KBC Asset Management NV works with data suppliers with expertise in Responsible Investing that provide data to the specialized researchers, who process and complete the data with publicly available information (including annual reports, press publications, etc.).

The sub-fund promotes a combination of environmental and social characteristics, and has the objective of investing a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The issuers in which it invests must follow good governance practices. The sub-fund is compliant with article 8(1) of Regulation (EU) 2019/2088 of the European Parliament and of the council of 27 November 2019 on sustainability-related disclosures in the financial services sector ('SFDR').

#### **Negative screening**

In practical terms the end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the responsible investment universe which fall foul of the exclusion policies available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

The application of these policies means that issuers involved in such activities like the tobacco industry, weapons, gambling and adult entertainment are excluded from the sub-fund's investment universe. This screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be adapted from time to time under the supervision of the Responsible Investing Advisory Board.

### Positive selection methodology

Within the defined investment universe and other limits described above, the responsible investment objectives of the sub-fund are the following:

- (1) promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better **ESG score**, where ESG stands for 'Environmental, Social and Governance', and
- (2) promote climate change mitigation, by preferring issuers with lower **Carbon Intensity**, with the objective of meeting a predetermined carbon intensity target;
- (3) support sustainable development by including issuers that contribute to the **UN Sustainable Development Goals** and
- (4) support sustainable development by encouraging the transition to a more sustainable world via **bonds**, **financing green and/or social projects**.

The sub-fund's targets are available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (1) ESG Score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG score. This score represents the aggregated performance assessment of a given entity against a series of ESG criteria which are grounded to the extent possible against objective measures. The main factors underpinning the ESG criteria are:

- In the case of instruments issued by companies:
  - o respect for the environment (e.g., reduction in greenhouse gas emissions);
  - o attention to society (e.g., employee working conditions); and
  - o corporate governance (e.g., independence and diversity of the board of directors).

The ESG score for companies is an ESG risk score supplied by a data provider.

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments:
  - o overall economic performance and stability (e.g., quality of institutions and government);
  - o socio-economic development and health of the population (e.g., education and employment);
  - o equality, freedom and the rights of all citizens;
  - o environmental policy (e.g., climate change); and
  - o security, peace and international relations.

These lists are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

To achieve this objective, the ESG score of the portfolio for companies is compared to a reference portfolio determined on the basis of the above-mentioned target spread. The ESG score for countries of the portfolio is compared to a reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

More information on the ESG Score and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (2) Carbon Intensity

The objective to promote climate change mitigation, by favoring lower carbon intensity issuers, with the goal of meeting a predetermined carbon intensity target covers at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent), divided by revenues (in mln USD). For countries, it is defined as the greenhouse gas emissions (in tonnes CO2 equivalent), divided by the Gross Domestic Product (in current prices, in mln USD).

The targets for instruments issued by companies are different from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The targets may be revised upwards or downwards.

More information on Carbon Intensity and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

### (3) UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. Instruments of companies that meet these requirements are designated as "sustainable investments", according to Article 2.17 of the SFDR.

Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to sustainable development. Bonds of supranational governments are considered a sustainable investment if one of the two criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability)).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst half of our screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

More information about this and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures. The targets may be revised upwards or downwards.

#### (4) Bonds, financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bonds Principles and Social Bonds principles on the use of proceeds. Instruments that meet these requirements are labelled 'sustainable investments', in line with article 2(17) SFDR.

More information on bonds financing green and/or social projects and the concrete goals of the compartment can be found available on the website of the Branch: <a href="https://www.ubbam.bg/en/expertease">https://www.ubbam.bg/en/expertease</a>, section "Documents", Sustainability-related disclosures.

#### **Potential Exceptions**

It cannot be ruled out, however, that very limited investments may be made temporarily in assets that do not meet the above criteria. The reasons for this include the following:

- Developments as a result of which an issuer can no longer be regarded as eligible after purchase;
- Corporate events, such as a merger of one company with another, where the merged company can no longer be considered an eligible issuer:
- Incorrect data as a result of which assets are purchased when it should not have been eligible for the sub-fund;
- A planned update of the screening criteria as a result of which assets should be excluded from the sub-fund, but which the management company chooses to refrain from selling immediately in the best interest of the customer (e.g. transaction charges, pricing volatility);
- External circumstances such as market movements and updates of external data can lead to investment solutions failing to achieve the abovementioned targets.

In these cases, the fund manager will replace the assets concerned with more appropriate assets as soon as possible, always taking into account the sole interest of the investor.

In addition, for the purpose of efficient portfolio management, the fund manager may to a significant degree use derivatives relating to assets issued by issuers that would not be eligible for inclusion in the sub-fund, in so far as there is no serviceable and comparable alternative available on the market. Inaddition, the counterparties with which the derivative transactions are entered into may not necessarily be issuers having a responsible nature.

The share component is invested in a global selection of shares that can come from any region, sector or topic.

The bond component consists of bonds and debt securities issued by companies and government securities. All maturities are taken into account when choosing bonds and debt instruments. The Master Sub-Fund invests, directly and / or indirectly, at least 50% of the assets invested in bonds and debt instruments, in securities with an investment rating (minimum rating - long-term BBB- / Baa3, short-term A3 / F3 / P3), provided by at least one of Moody's, Moody's Investors Service; Standard & Poor's; Fitch, Fitch Ratings, and/ or government securities issued in local currency or non-subordinated corporate bonds that do not have an investment rating from one of the above rating agencies, but whose issuer has an investment rating of at least one of the rating agencies referred to above and / or in money market instruments whose issuer has received an investment rating from one of the aforementioned rating agencies.

This means that the Master Sub-Fund may invest up to 50% of the assets invested in bonds and debt instruments, in instruments that do not have a credit rating from the above-mentioned rating agencies and / or that do not meet the above credit rating requirements.

The fund is actively managed without referring to any benchmark.

The responsible character is guaranteed by the aforementioned Responsible Investing methodology.

#### Taxonomy related information

At the date of this prospectus, the sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy Framework. The percentage invested in environmentally sustainable activities within the meaning of the EU Taxonomy Framework at all times is 0%. The underlying investments of this sub-fund do not take into account the EU criteria for environmentally sustainable economic activities. This will be monitored on a regular basis and as soon as sufficiently reliable, timely and verifiable data from issuers or investee companies is available and final regulatory technical standards are published providing more detailed guidance on the Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability disclosure in the financial services sector and on how Taxonomy information should be made public, the prospectus will be updated.

#### Required disclaimer J.P. Morgan:

Information has been obtained from sources believed to be reliable, but J.P. Morgan does not guarantee its completeness or accuracy. The Index is used by permission. The Index may not be copied, used or distributed without the prior written permission of J.P. Morgan. Copyright 201(7), J.P. Morgan chase & Co. All rights reserved.

#### Transparency of adverse sustainability impacts

The master sub-fund considers the principal adverse impacts of its investment decisions on sustainability factors by taking into account the principal adverse impact indicators ('PAI'), as described in the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosure in the financial services sector ('SFDR'). The principal adverse impacts on sustainability factors are explicitly taken into account through the general exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. More information on the principal adverse impact indicators taken into account can be https://www.ubbam.bg/en/about-us/reports>Documents>Sustainability-related disclosures>General exclusion policy for conventional funds and Responsible Investing funds and the exclusion policy for Responsible Investing funds. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV (more information can be found at https://www.ubbam.bg/en/about-us/reports>Documents>Basic documents>Proxy Voting and Engagement Policy and www.kbc.be/investment-legal-documents> Retrospective Proxy Voting - overview > Proxy Voting and Engagement Policy). As part of its commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with the Proxy Voting and Engagement Policy KBC AM NV. Where appropriate, KBC Asset Management NV will engage in dialogue with the management of the companies concerned, if necessary before voting.

More information on how the master sub-fund aims to consider the principal adverse impacts on sustainability factors can also be found in the Annex 7 attached to this prospectus, which specifically covers the pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852. A statement on how the master sub-fund has considered the principal adverse impacts on sustainability factors during the reporting period can also be found in the annual report for this sub-fund, which will be published after 1 January 2023.

Derivatives may be used by the Master Sub-Fund both to achieve the investment objectives and to hedge risks.

Listed and unlisted derivatives may be used to achieve the objectives: these may be forward contracts, futures, options or swaps on securities, indexes, currencies or interest rates or other transactions involving derivatives. Unlisted derivatives transactions will only be concluded with prime financial institutions specialised in such transactions.

Subject to the applicable laws and regulations and the articles of association of the Master Umbrella Fund, the Master Sub-Fund always seeks to conclude the most effective transactions. All costs associated with the transactions will be charged to the Master Sub-Fund and all income generated will be paid to the Master Sub-Fund.

If the transactions result in a risk in respect of the counterparty, this risk can be hedged by using a margin management system that ensures that the Master Sub-Fund is the beneficiary of collateral in the form of liquid instruments, such as, for instance, cash or investment grade bonds. The relationship with the counterparty or counterparties shall be governed by standard agreements used on the international markets.

Derivatives may also be used to hedge the assets of the Master Sub-Fund against open exchange rate risks in relation to the currency in which the Master Sub-Fund is denominated.

Where derivatives are used, they must be easily transferable and liquid instruments. Using derivatives does not, therefore, have a negative impact on liquidity risk. The use of derivatives may, however, affect the spread of the portfolio across regions, sectors or themes. Consequently, there may be an impact on concentration risk. Derivatives may not be used to protect capital, neither fully nor partially. They neither increase nor decrease capital risk. In addition, using derivatives has no negative impact on credit risk, settlement risk, custody risk, flexibility risk or inflation risk or risk dependent on external factors.

The Master Sub-Fund may conclude contracts that entail a credit risk in respect of issuers of debt instruments. Credit risk is the risk that the issuer of the debt instrument will default. This credit risk relates to parties whose creditworthiness at the time the contract is concluded is equal to that of the issuers whose debt instruments the Master Sub-Fund can

hold directly. Credit derivatives may possibly be used both to carry out the investment objectives and to cover the credit risk, but solely within the existing risk profile and without implying any shift to less creditworthy debtors than those the Master Sub-Fund can invest in.

### 3. Risk

### Sub-Fund's risk profile

As the Sub-Fund is a feeder sub-fund which invests all or substantially all of its assets in shares issued by the Master Sub-Fund, may hold ancillary liquid assets (cash) up to an amount necessary for meeting its ongoing expenses and may only have limited derivative positions to hedge market risk, the Sub-Fund's risk profile is identical to the risk profile of the Master Sub-Fund, namely dynamic. This risk profile is valid for investors domiciled in Bulgaria.

According to the Methodology for Classification of Collective Investment Schemes of the Bulgarian Association of Asset Management Companies the risk profile of this Sub - Fund determined based on the geographical and market risk to which it is exposed corresponds to a global equity fund.

In order to better understand the reasons behind this assessment and review the possible risks connected with their investment in the Sub-Fund, investors must take into account of the risk factors set out in section "Risks resulting from using hedge derivatives by the Sub-Fuds" and "Risks resulting from the structure of the main feed-in collective investment scheme" from section G. General information on the risk profile of the Sub-Funds in Part I of this Prospectus, as well as review the information in the following table, which summarises the characteristic risk of the Master Sub-Fund to which they are indirectly exposed as a result of the Sub-Fund's investment in the Master Sub-Fund:

Risk type	Concise definition of the risk	Effect on Master Sub- Fund	Explanation:
Market risk	The risk that the entire market of an asset class will decline, thus affecting the prices and values of the assets in the portfolio	moderate	the level of the risk reflects the volatility of the equity component of the Master Sub-Fund.
Credit risk	The risk that an issuer or a counterparty will default	moderate	the bond component of the Master Sub-Fund invests primarily - but not exclusively- in bonds with an investment grade rating. Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds may fall.
Settlement risk	The risk that settlement of a transaction via a payment system will not take place as expected	low	
Liquidity risk	The risk that a position cannot be liquidated in a timely manner at a reasonable price	low	

Exchange or currency risk	The risk that the value of an investment will be affected by changes in exchange rates	high	since there are investments of the Master Sub-Fund in securities that are denominated in currencies other than the Bulgarian lev or the Euro, there is a considerable chance that the value of an investment will be affected by movements in exchange rates.
Custody risk	The risk of loss of assets held in custody with a custodian or sub-custodian	low	
Concentration risk	The risk relating to a large concentration of investments in specific assets or in specific markets	low	
Performance risk	Risks relating to the performance of the Master Sub-Fund	moderate	the level of the risk reflects the volatility of the equity component
Capital risk	Risks to capital	moderate	There is no capital protection.
Flexibility risk	Inflexibility both in taking decisions as to a product in the portfolio and constraints on switching to other providers	low	
Inflation risk	Risk of inflation	low	
Environmental factors	Uncertainty regarding the immutability of environmental factors, such as the tax regime	low	

### Risk profile of the targeted investor

Profile of the targeted investor for which the sub-fund has been designed: Dynamic profile.

This means an investor who is interested in a potentially higher return by distributing his investments evenly between stocks and interest-bearing financial instruments. Under normal market conditions, for this type of investor, this distribution represents a good balance between risk and return. However, this type of investors are aware that prices may fall. Therefore, striving for higher returns requires taking additional risk. Dynamic investors can afford to invest their money for a longer period of time.

The recommended holding period of an investment in this Sub-Fund is minimum 6 years.

## 4. Information concerning the subscription and

## redemption of units in the Sub-Fund

### How to subscribe and redeem units in the Sub-Fund

KBC AM has assigned the activity of subscription and redemption of the units in the Sub-Fund to the Distributor and its office network, where orders for subscription and redemption of units are accepted.

### Subscription of units in the Sub-Fund

The purchase order for units in a Sub-Fund is executed within 7 days as from the date of its submission.

The investor receives a confirmation of the transaction, which can be obtained (i) in person, at the place of submitting the order - without paying additional costs, or (ii) by e-mail, to an e-mail address specified by the investor and the investor has explicitly indicated its preference to receive information by e-mail and not receiving it on paper and (iii) on mobile device for orders executed using the Distributor's app on Android and iOS (ОББ Мобайл) for the conclusion of an

Agreement for Systematic Investment (Systematic Investment Plan - SIP).

The payment of the purchased units is made by a wire transfer. The submission of purchase orders can be done at a branch of the Distributor, as the investor shall indicate in his order a bank account, opened with the Distributor, and if he does not have one - to open a current account to the Distributor.

At the moment of submitting the purchase order, the funds necessary for payment of the issue price of the subscribed units and of the bank fees of the Distributor (if any), on the specified account are blocked in favor of the Sub-Fund, until the moment of execution of the order (respectively conclusion of the transaction). The order is executed, up to the amount of the blocked funds on the account, taking into account the applicable bank fees of the Distributor (if any), except when the submitted order is below the minimum amount of the investment.

The investor may indicate an amount which he wishes to invest in units in the Sub-Fund. After determining the issue price per unit of the Sub-Fund, the account of the investor (if the order is submitted in a Distributor's branch) is debited with the amount of the purchase order, which is divided by the determined issue price per unit. If a round number of units cannot be issued against the amount paid, the investor acquires a fraction of a unit, and the number of units purchased is cut to the fourth decimal point. If the investor has stated in the order that he wishes to acquire a round number of units, it is possible that there is a balance of the paid amount, which is refunded within 3 days from the date of execution of the order.

When submitting a purchase order for units, the investor may limit the number of units he wishes to acquire. In case the requested/transferred funds allow for the acquisition of a larger number of units than as per the limitation, the order is executed up to the amount of the limit and the procedure for refund applies.

The investor may indicate the number of units he wishes to purchase. In this case, the specified units are multiplied by the last announced issue price and the indicative amount for the execution of the order is blocked. After calculating the issue price, the transaction is executed according to the requested number of units multiplied by the issue price, which is valid for the date of submission of the purchase order.

In the event that the issuance (sale) of units of the Sub-Fund is suspended in the manner and under the conditions described in this Prospectus, purchase orders submitted after the last announcement of the issue price before the start date of the suspension period shall not be executed. The purchase of units is executed after the resumption of the issue (sale) of units of the Sub-Fund, by submitting a new order in the order in compliance with the rules, described in this Prospectus. Only the purchase orders of units submitted in accordance with all the requirements described in the Prospectus are executed.

The investor can submit a cancellation order until 17:00 on the same business day (day T), after which the purchase order becomes irrevocable, according to current legislation. For orders submitted after 17:00 (day T), cancellation orders are accepted until 17:00 on the next business day (day T+1). After the expiry of these periods, the purchase orders are considered irrevocable.

The minimum amount of the investment for acquisition of units of the Sub-Fund is BGN 10 (ten leva). The investor shall receive confirmation of the transaction as soon as possible, but not later than the end of the first business day following the execution of the order.

### Systematic investment plans

If the investor enteres into an Agreement for Systematic Investment (Systematic Investment Plan - SIP), the investor may choose to make monthly contributions. He may also indicate different dates for the respective contributions. The investor may also choose different accounts, from which the cash contribution shall be collected and at least one current account at the Distributor.

Investors can also execute SIP Agreements through mobile devices by using the Distributor's app on Android and iOS (ОББ Мобайл).

The investor's account(s) is blocked on the day of submitting the order and is debited on the next business day after the issue price has been calculated. The purchase order under SIP Agreement is automatically generated on the investment day, specified by the investor, whereby the order is considered submitted. In the cases when the investment period chosen by the investor coincides with a non-working day, the order is generated and considered submitted on the first business day which follows. In case the investor has not provided sufficient funds on his account on the day chosen for investment, the order is considered invalid and is automatically cancelled by the system. The cash contribution for the missed investment period are not transferred for the next investment period. If for 3 (three) consecutive periods the investor did not provide the selected amount for investment on his account, the respective SIP Agreement is automatically terminated.

The minimum amount of the investment when purchasing units of the Sub-Fund, for the orders executed on the basis of a SIP Agreement is in the amount of BGN 10 (ten leva).

### Initial Subscription of Units in the Sub - Fund

After obtaining an authorization by the FSC for the establishment and management of the Sub-Fund, KBC AM through the Distributor will commence an Initial Subscription procedure, where during the Initial Subscription Period the prospective investors may express non-binding interest to subscribe units in the Sub-Fund and thereby after the expiration of the Initial Subscription Period to subscribe units in the Sub-Fund at the Initial Subscription Price, which will be equal to their nominal value of BGN 10 (ten leva). During the Initial Subscription Period no NAV, issue price and redemption price of the units in the Sub-Fund will be calculated and published and no other subscription orders for units in the Sub-Fund will be accepted. For more details on the Initial Subscription, please refer to sub-section *Initial Subscription of Part I of this Prospectus*.

### Redemption of units in the Sub-Fund

The investor has the right to submit a redemption order for all or part of the units held by him. If when submitting a redemption order it is evident that after its execution the remaining units on the investor's balance would be less than 1 (one) number of units of the Sub-Fund, the redemption order should be submitted for all units held and the investor should zero its account. This order is executed only if the units are kept on a client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD. In case the units are kept on the client sub-account of the investor to the account (register) of another investment intermediary, redemption is performed only after the transfer of these units on the client sub-account of the investor to the account (register) of the Distributor at the Central Depository AD.

The redemption of units of the Sub-Fund is carried out by submitting a written order, accompanied with additional necessary documents, attached thereto by the investor (unitholder in the Sub-Fund, a person authorized by him or his legal representative) to the Distributor. The redemption orders are submitted in the Distributor's branches.

The investor may indicate a number of units for redemption. After determining the redemption price per unit of the Sub-Fund, the number of units requested for redemption in the order is multiplied by the redemption price and the resulting amount is transferred to the investor's account specified in the order.

The investor may indicate an amount for redemption. Where the investor has indicated an amount, this amount shall be divided by the redemption price announced and valid for the closest day to the day of the submission of the order and thus the approximate number of units to be redeemed is determined. These units are blocked. After determining the redemption price per unit of the Sub-Fund, the amount specified in the order is divided by the redemption price and the number of units to be redeemed is determined so that to satisfy the amount specified by the investor.

The redemption order of the Sub-Fund' units is executed within 10 days from the date of its submission.

The investor may submit a cancellation order until 17:00 on the same business day, after which the redemption order becomes irrevocable, in accordance with the current legislation. For orders submitted after 17:00, cancellation orders are accepted until 17:00 on the next business day. After that, orders are considered irrevocable.

In the event that the redemption of units of the Sub-Fund is suspended according to the procedures and under the conditions described in the legislation in force and this Prospectus, the redemption orders submitted after the last announcement of the redemption price before the start date of the suspension period shall not be executed. The redemption of units is executed after the resumption of the redemption of units of the Sub-Fund, by submitting a new order under with the rules, described in this Prospectus.

The order is considered executed at the time of registration of the transaction in Central Depository AD.

The investor receives confirmation of the transaction as soon as possible, but not later than at the end of the first business day, following the execution of the order.

Investors may find additional information on the subscription and redemption of units in the Sub-Fund, on the simultaneous sale and purchase of units, as well as the necessary documents which need to be attached to the subscription and redemption order in section *Rules for issuance and redemption of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Calculation of the net asset value, issue price and redemption price

The net asset value, issue price and redemption price of the units of the Sub-Fund is determined on each business day based on the evaluation of the Sub-Fund's assets for the immediately preceding business day made in accordance with the Rules for valuation of the assets and determination of the net asset value of the Umbrella Fund. During periods of suspended issuance and redemption of units no issue and redemption price is calculated.

The issue price per unit of a Sub-Fund for a given business day shall be calculated as to the net asset value per unit of this Sub-Fund for the preceding business day is added the issuance fee payable by the investor in accordance with Subsection *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus.

The redemption price per unit of a Sub-Fund for a given business day shall be calculated as from the net asset value per unit of this Sub-Fund for the preceding business day is subtracted the redemption fee payable by the investor in accordance with Sub-section *One-off fees and charges charged to the investors* of Section 3 *Type of fees and charges* related to the Umbrella Fund of Part I of the Prospectus. Investors who hold their units in the Sub-Fund for a period longer than one month of subscription can redeem their units free of redemption fee, i.e. the redemption price for one unit held by such unitholder will be equal to the net asset value per unit of the respective Sub-Fund for the day preceding the unitholder's redemption order.

Investors may find additional information on the process of calculation of the net asset value, issue price and redemption price of the units in the Sub-Fund in section *Rules for the determination of the issue price and redemption price of the units in the Umbrella Fund and Sub-Funds* of Part I of this Prospectus.

### Publication of the net asset value, issue price and redemption price

The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given day T is published no later than 17:00 on the following day T+1 on the Branch's website under <a href="www.ubbam.bg">www.ubbam.bg</a> (ExpertEase Strategies) and on the website of the Distributor – <a href="www.ubb.bg">www.ubb.bg</a> (Individual Clients, Savings and Investments, Funds, Multifaceted).

## 5. Type of unit and fees and charges

### Types and characteristics of the units issued by the Sub-Fund

Type of units offered to the public	Currency for the calculation of the net asset value	ISIN code	Initial Subscription Price
dematerialized, registered, transferable units	BGN	BG9000001222	BGN 10

#### General characteristics

The units issued by the Sub-Fund are financial instruments, which incorporate the rights of their holders over a portion of the respective Sub-Fund's assets.

The units of each Sub-Fund are ordinary, freely transferable, registered and are issued in dematerialised form. They are registered with Central Depository AD and can be offered to the public in the Republic of Bulgaria.

The units in the Sub-Fund are denominated in Bulgarian lev (BGN) and have a nominal value of BGN 10 each.

#### **Contributions**

Investors can subscribe units in the Sub-Fund only against contributions in cash. The minimum subscription amount is BGN 10. When a subscription order is placed, the value of the order is divided by the issue price per unit, calculated for the respective day based on the Sub-Fund's net asset value. The Sub-Fund may issue only units or fractions of units whose issue price has been paid in full.

### Transfer of units

The units in the Sub-Funds can be transferred freely, without any restrictions or additional conditions, in accordance with the will of their holders and in compliance with the specific requirements of the applicable legislation on the transfer of financial instruments.

#### Unit form and unit certificates

The units of the Sub-Fund shall be issued in a dematerialized (registered) form. The book of unitholders for each Sub-Fund is maintained by Central Depository AD. At the investor's request and at his expense, Central Depository AD can issue a certificate for the units owned by such investor.

### Rights provided by the units

All units in the Sub-Fund give their owners equal rights. Each such unit provides its holder with the right to a respective portion of the assets of the individual Sub-Fund, including upon its liquidation or the liquidation of the Umbrella Fund, a redemption right, an information right and the right to lodge a complaint. Property rights on fractions of units held in a Sub-Fund are acquired and exercised by the respective holder in their proportion to a full unit.

The units in the Sub-Fund of the Umbrella Fund are non-voting units, i.e. they do not give voting rights to the investor.

Investors can find a summary of their rights as investors in Bulgarian and English, available at the following hyperlink (for Bulgarian language) <a href="https://www.ubbam.bg/about-us">https://www.ubbam.bg/about-us</a>, Документи, Основни документи, Резюме на правата на инвеститорите and (in English) <a href="https://www.ubbam.bg/en/about-us">https://www.ubbam.bg/en/about-us</a>, Documents, Basic documents, Summery of investors rights.

### **Dividend payment**

The Sub-Fund does not distribute its accumulated profit as dividend among its unitholders. KBC AM reinvests the profit of the Sub-Fund with view of increasing the net asset value, the issue price and the redemption price of the Sub-Fund, in the interest of its unitholders. The reinvestment of the income is carried out in accordance with the investment goals, strategies, policy, and restrictions of the Sub-Fund, taking into account the specific market conditions and in compliance with the regulatory requirements and internal acts of the Umbrella Fund.

Investors can find further information on the characteristics of the units issued by sub-funds of the Umbrella Fund in Part I, Section Rights provided by the units in the Sub-Funds of this Prospectus.

### Fees and charges

#### One-off fees and charges charged to the investor unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per share

	Subscription	Redemption	Switching between sub-funds
Trading fee	Max 2.50%	-	Max. 2.50%
Administrative charges	-	-	-
Amount to cover the costs of the purchase/sale of assets	-	-	-
Amount to discourage sales within one month of purchase	-	Max 5.00%	Max 5.00%

### Establishment Expenses

All fees and expenses relating to the establishment of the Sub-Fund, including the fees of the professional advisers, any application fee(s) imposed by the Financial Supervision Commission in connection with the authorization of the establishment and management of the Sub-Fund and the registration of the units for sale will be borne by the Sub-Fund.

## Recurrent fees and charges paid by the Sub-Fund unless indicated otherwise, in the currency the Sub-Fund is denominated in or as a percentage of the net asset value per unit

Fee	Way of calculation	Amount
Management Fee of KBC AM	calculated only on the part of the assets of the Sub-Fund, which is invested in financial instruments, other than shares, issued by the Master Sub-Fund*	Max. 1.83 % per year
Custodian Fee	Per year	2820 leva per year, whereas a proportional part of the fee is paid on monthly basis
Other ongoing charges	calculated on the basis of the average total net assets of the Sub-Fund	Max. 1.40 % per year until the third anniversary of the Sub-Fund and max. 0.10 % thereafter

<sup>\*</sup> However, the management company will collect a management fee, calculated and charged on the assets of the Master Sub - Fund, which are acquired as a result of the investments made by the Sub - Fund therein. Management fee will be max. 1.83 % of the average amount of the total assets of the Master Sub-Fund. This management fee will be indirectly borne by the Sub-Fund, as a shareholder in the Master Sub-Fund, which means that it will ultimately be indirectly borne by the unitholders in the Sub-Fund. The Management Company will not charge a management fee on the Sub-Fund's assets that are invested (i.e. represent investments) in shares issued by the Master Sub-Fund, thus avoiding double charging management fee on the same assets.

In addition, the Master Sub-Fund bears other ongoing costs and charges in connection with its investments, which are charged on the assets of the Master Sub-Fund, acquired due to investments made by the Sub-Fund. Therefore, these costs and charges will be indirectly borne by the Sub-Fund as shareholder in the Master Sub-Fund, hence they will be ultimately at the expense of the unitholders in the Sub-Fund.

A description of the ongoing costs and charges of the Master Sub-Fund which will be paid indirectly by the Sub-Fund can be found in subsection "Other ongoing charges of the Master Sub-Funds", section "Ongoing/Recurrent fees and charges",

part C. Corporate Information of Part I of this Prospectus.

Fees and charges, borne directly and indirectly by the Sub-Fund may not exceed 5% of the average annual net asset value of the Sub-Fund.

### **Appendix 1**

# Rules for portfolio valuation and determination of the net asset value of the sub-funds of the UBB ExpertEase Umbrella Mutual Fund

(Amended since 16.11. 2021, 06.01.2023) Present Rules for portfolio valuation and determination of the net asset value of the sub-funds of UBB ExpertEase Umbrella Fund (the "Rules") sets out the rules and process for evaluating assets and liabilities, as well as the methods for determining the net asset value ("NAV"), the NAV per unit, the issue value and the return price redemption of each of the investment sub-funds (jointly hereinafter referred to as the "Sub-Funds" and each one separately the "Sub-Fund") of the UBB ExpertEase Umbrella Mutual Fund ("Umbrella Fund"):

Name of the Sub-Fund	Risk profile*
UBB ExpertEase Defensive Balanced (BGN)	Global mixed "balanced" fund
UBB ExpertEase Defensive Balanced (EUR)	Global mixed "balanced" fund
UBB ExpertEase Defensive Tolerance (BGN)	Global mixed "balanced" fund
UBB ExpertEase Defensive Tolerance (EURO)	Global mixed "balanced" fund
UBB ExpertEase Dynamic Balanced (BGN)	Global share fund
UBB ExpertEase Dynamic Balanced (EUR)	Global share fund
UBB ExpertEase Dynamic Tolerant (BGN)	Global share fund
UBB ExpertEase Dynamic Tolerant (EUR)	Global share fund
UBB ExpertEase Highly Dynamic Tolerant (BGN)	Global share fund
UBB ExpertEase Highly Dynamic Tolerant (EUR)	Global share fund
UBB ExpertEase Defensive Conservative Responsible Investing	Global mixed "balanced" fund
UBB ExpertEase Defensive Balanced Responsible Investing	Global mixed "balanced" fund
UBB ExpertEase Dynamic Balanced Responsible Investing	Global share fund
UBB ExpertEase Defensive Tolerant Responsible Investing	Global mixed "balanced" fund
UBB ExpertEase Dynamic Tolerant Responsible Investing	Global share fund
UBB ExpertEase Highly Dynamic Tolerant Responsible Investing	Global share fund

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<sup>\*</sup> According to the Methodology for classification of collective investment schemes of the Bulgarian Association of Asset Management Companies.

The NAV of the Sub-Funds is determined every business day of the week in accordance with the requirements of the applicable legislation, the Rules of the Umbrella Fund and these Rules.

# I. (Amended since 20.11.2020, 16.11. 2021, 11.04.2022, 06.01.2023z., 20.01.2023, 07.04.2023) INFORMATION ABOUT THE SUB-FUNDS AND THE COMPONENTS OF THEIR PORTFOLIO

In accordance with the Rules of the Umbrella Fund and the Prospectus of the Umbrella Fund, the Umbrella Fund is a feeder collective investment scheme within the meaning of art. 67 of the Activities of Collective Investment Schemes and Other Undertakings for Collective Investment Act ("CISOUCIA") and each Sub-Fund invests without complying with the provisions of art. 4(1)(1), art. 38, 45, 48 and art. 49(2)(3) of the CISOUCIA, at least 85% of its assets in units of certain investment subfunds (hereinafter referred to as the "Master Sub-Funds" and each of them "Master Sub-Fund") of Horizon N.V. (Horizon NV), an open-ended investment company duly incorporated and existing under the laws of the Kingdom of Belgium, with its seat and registered office in Brussels 1080, Havenlaan 2 ("Master Umbrella Fund"). For certain Master Sub-Funds, as indicated hereinbelow, two Sub-Funds are available, one of which with EUR-denominated units that invests in the corresponding share class of the respective EUR-denominated Master Sub-Fund and the other whose units are denominated in Bulgarian levs, which invests in the corresponding class of shares of the respective BGN-denominated Master Sub-Fund, and for the other Master Sub-Funds there is only one corresponding Sub-Fund, whose units are denominated in Bulgarian levs, and which invests in the corresponding class of shares of the relevant EUR-denominated Master Sub-Fund, as follows:

	Name of the Sub-Fund	Name of the Master Sub-Fund
1.	UBB ExpertEase Defensive Balanced (BGN)	Horizon KBC Defensive Balanced Institutional F shares BG class in EUR
	ISIN BG9000004218	ISIN BE6324083714
2.	UBB ExpertEase Defensive Balanced (BGN) ISIN BG9000003210	Horizon KBC Defensive Balanced Institutional F shares BG class in BGN ISIN BE6324084720
3.	UBB ExpertEase Defensive Tolerance (EURO) ISIN BG9000005215	Horizon KBC Defensive Tolerant Institutional F shares BG class in EUR ISIN BE6324087756
4.	UBB ExpertEase Defensive Tolerance (BGN) ISIN BG9000006213	Horizon KBC Defensive Tolerant Institutional F shares BG class in BGN ISIN BE6324086741
5.	UBB ExpertEase Dynamic Balanced (EUR) ISIN BG9000008219	Horizon KBC Dynamic Balanced Institutional F shares BG class in EUR ISIN BE6324090784
6.	UBB ExpertEase Dynamic Balanced (BGN) ISIN BG9000007211	Horizon KBC Dynamic Balanced Institutional F shares BG class in BGN ISIN BE6324088762
7.	UBB ExpertEase Dynamic Tolerant (EUR) ISIN BG9000009217	Horizon KBC Dynamic Tolerant Institutional F shares BG class in EUR

		ISIN BE6324092806
8.		Horizon KBC Dynamic Tolerant
	UBB ExpertEase Dynamic Tolerant (BGN)	Institutional F shares BG class in BGN
	ISIN BG9000010215	ISIN BE6324091790
9.		Horizon KBC Highly Dynamic Tolerant
	UBB ExpertEase Highly Dynamic Tolerant (EUR)	Institutional F shares BG class in EUR
	ISIN BG9000012211	ISIN BE6324094828
10.		Horizon KBC Highly Dynamic Tolerant
	UBB Expertise Highly Dynamic Tolerant (BGN)	Institutional F shares BG class in BGN
	ISIN BG9000011213	ISIN BE6324093812
11.		Horizon KBC Defensive Conservative
	UBB ExpertEase Defensive Conservative	Responsible Investing
	Responsible Investing	Institutional F shares BG class in EUR
	ISIN BG9000006221	ISIN BE6331692176
12.		Horizon KBC Defensive Balanced
	UBB ExpertEase Defensive Balanced Responsible	Responsible Investing Institutional F shares BG class in EUR
	Investing ISIN BG9000005223	ISIN BE6331693182
13.	131N BG9000003223	Horizon KBC Dynamic Balanced
13.	UBB ExpertEase Dynamic Balanced Responsible	Responsible Investing
	Investing	Institutional F shares BG class in EUR
	ISIN BG9000003228	ISIN BE6331694198
14.		Horizon KBC Defensive Tolerant
	UBB ExpertEase Defensive Tolerant Responsible	Responsible Investing
	Investing	Institutional F shares BG class in EUR
	ISIN BG9000004226	ISIN BE6331695203
15.		Horizon KBC Dynamic Tolerant
	UBB ExpertEase Dynamic Tolerant Responsible	Responsible Investing
	Investing	Institutional F shares BG class in EUR
	ISIN BG9000002220	ISIN BE6331696219
16.		Horizon KBC Highly Dynamic Tolerant Responsible Investing
	UBB ExpertEase Highly Dynamic Tolerant Responsible Investing	Institutional F shares BG class in EUR
	ISIN BG9000001222	ISIN BE6331698231
	.5 20000001222	.5 520001000201

In accordance with the investment objective and the investment policy of each Sub-Fund, the assets of each Sub-Fund will be invested as follows:

Asset class	Percentage of the Sub- Fund's assets
Institutional F shares BG class in a Master Sub-Fund	At least 85%
Cash in bank	Up to 15%
Derivatives according to art. 38(1)(7) and (8) and art. 42, 43 of the CISOUCIA	

#### II. BASIC PRINCIPLES

The assets valuation of each Sub-Fund shall be performed by the management company entrusted with the management of the Umbrella Fund - KBC Asset Management N.V. (KBC Asset Management NV), a company established in accordance with the laws of the Kingdom of Belgium, having its seat and registered office: 1080, Havenlaan 2, B-1080 Brussels, Kingdom of Belgium, entered in the Brussels Register of Legal Entities under identification number 0469.444 .267 (the "Management Company"), through KBC Asset Management N.V. - Branch, a branch of a foreign legal entity established in accordance with the laws of Bulgaria, having its seat and registered office: city of Sofia 1463, Triaditsa District, 89B Vitosha, Millennium Center, fl. 6, entered in the Commercial Register and the Register of Non-Profit Legal Entities at the Registry Agency under UIC 205422541 (the "Branch"), under the control of the depository bank of the Umbrella Fund - United Bulgarian Bank AD, a licensed credit institution registered in the Commercial Register and the Register of Non-Profit Legal Entities at the Registry Agency under UIC 000694959, holding a full banking license, issued by the Bulgarian National Bank on 19.11.1992 and last amended by Order No PД 22 – 2250/16.11.2009 of the Bulgarian National Bank (the "Depository bank"), in accordance with the requirements of the CISOUCIA, Ordinance No 44 of 20.10.2011 \* and other applicable legislation.

The assets valuation and the determination of the NAV of each Sub-Fund shall be carried out in accordance with the following principles:

- ➤ The net asset value of each Sub-Fund shall be determined on each business day of the week, including the value of all assets and liabilities held by the Sub-Fund on the balance sheet as at the date of the valuation.
- The calculation of the net asset value uses a uniform and consistent valuation system, taking into account the relevant costs associated with the sale and redemption of units, including the remuneration of the Management Company if any and the Depositary Bank, as well as other relevant unit and / or running costs, including costs related to the investment of each Sub-Fund in its corresponding Master Sub-Fund.
- ➤ The net asset value of the Sub-Funds shall be calculated under the accounting policies and procedures in accordance with International accounting standards in accordance with § 1, item 8 of the Supplementary Provisions to the Accounting Act ("IFRS").
- The valuation of the Sub-Funds' assets shall be performed upon initial acquisition (recognition)
   at cost. The ex-post evaluation of the Sub-Funds' assets shall be performed on a daily basis at fair value.
- In transactions in securities, each Sub-Fund shall adopt the method of the trade date accounting (trade date). In this method, the securities are recorded (written off) on the balance sheet of the Sub-Funds on the date of the transaction, and not on the date of transfer of ownership thereover

<sup>\*</sup> Ordinance No 44 of 20.10.2011 on the requirements for the activity of collective investment schemes, management companies, national investment funds, alternative investment funds and persons managing and alternative investment funds.

(settlement). The securities are written off from the balance sheet at their carrying amount as of the date of concluding the sale transaction.

- ➤ The process of determining the NAV shall be carried out in the presence of reliable technological environment and software, allowing to minimize the possibility of errors.
- Reliability and representativeness of the information used for evaluation purposes.
- Documentary justification use of a reliable system for collecting and evaluating the information needed to determine the NAV; proper documentation of the decisions related to the determination of the NSA, including the application of the relevant documents to the minutes of the decisions taken.
- ➤ The information related to the determination of the NSA shall be stored in a system for protection of the documentation, including storage on a durable medium.
- Observance of the Rules for avoiding conflicts of interest and for providing protection against disclosure of inside information of the Branch in carrying out all processes in accordance with the Rules.
- Carrying out ongoing control of lawfulness, as well as methodological control of the evaluation activity.

#### III. MEASUREMENTS OF ASSETS

The value of the assets of each Sub-Fund includes the value of each of the assets held by the Sub-Fund on the balance sheet as at the date to which the valuation relates.

In accordance with Section II of the *Basic Principles* hereinabove, the assets valuation of each Sub-Fund shall be performed upon their initial acquisition (recognition) and on a daily basis at their fair value.

- 1. An asset shall be recognized at its acquisition cost determined in accordance with the IFRS.
- **2.** The ex-post evaluation of an asset shall be performed at fair value. Depending on the type of asset included in the Sub-Fund's portfolio, fair value shall be determined as follows:

### (Amended since 20.11.2020) Valuation of the shares in the Master Sub-Fund

**2.1.** (Amended since 11.04.2022) The fair value of the shares in the Master Sub-Fund, including in cases of temporary suspension of redemption, will be the last announced redemption price for the shares, issued by the respective Master Sub-Fund, which is equal to the NAV per share of the Master Sub-Fund.

In the event that the suspension of redemption of shares of a Master Sub-Fund lasts for a period longer than 30 days, the fair value per share shall be calculated by applying the net book value method.

The method of net book value of assets consists of calculating the value of a share of a Master Sub-Fund, the equity of the Master Sub-Fund (based on the last financial statement) being divided by the total number of shares outstanding. The following formula shall be used to perform the calculation:

$$P = \frac{A - L - PS}{N}$$

where:

*P* - the value of one share of the respective Institutional F share BG class of the Master Sub-Fund being evaluated;

A - assets;

L - liabilities:

PS - value of shares from other classes of shares in the Master Sub-Fund:

N - total number of shares of the respective Institutional F share BG class in circulation.

### Valuation of additional liquid assets

- **2.2.** The fair value of the additional liquid assets of the Sub-Fund according to art. 38(4) of the CISOUCIA shall be evaluated as at the day to which the evaluation refers to, as follows:
  - (a) cash at face value:
  - (b) sight deposits at nominal value;
  - (c) time deposits at their nominal value;
  - (d) no certain interest rate or income bearing short-term receivables at cost price;
  - (e) certain interest rate or income bearing short-term receivables at cost price.

#### **Evaluation of derivative financial instruments**

- **2.3.** Ex-post valuation of derivative financial instruments, admitted to or traded on a regulated market in the Republic of Bulgaria shall be performed as follows:
- (a) at the weighted average price of the transactions concluded therewith for the day as to which the valuation is performed, as announced through the trading system or in the stock exchange bulletin;
- (b) if the price under the preceding item cannot be determined, the price of the derivatives shall be determined as the arithmetic mean of the highest bid price of the orders valid at the time of closing the regulated market on the valuation day and the weighted average price of the transactions concluded with the respective derivative instruments for the same day. The price shall be determined in this way only in the event that there are transactions and orders with a bid price;
- c) should item (b) cannot be applied, the price of derivatives shall be the weighted average price of the transactions concluded therewith for the nearest day during the last 30-day period preceding the day on which the valuation for which transactions are concluded is performed.
- **2.4.** The ex-post evaluation of the fair value of derivative financial instruments with underlying assets securities admitted to or traded on regularly functioning, recognized, publicly available and active regulated markets abroad shall be performed as follows:
- (a) at the last price of a transaction concluded therewith on the relevant market on the day on which the valuation is performed;
- b) should item (a) cannot be applied, the evaluation shall be carried out at a bid price as at the closing of the market on the day on which the evaluation announced in the electronic system for price information of securities is performed;
- c) should item (b) cannot be applied, the evaluation shall be performed at the last price of a transaction concluded therewith within the last 30-day period preceding the day on which the evaluation is performed.
- **2.5.** In the event that the methods set out in paragraphs 2.3 and 2.4 cannot be applied, the ex-post evaluation of the fair value of options admitted to or traded on active regulated markets shall be performed using the *Black-Scholes model* to determine the option price. The *Black-Scholes model* treats the evaluation of call options, therefore the formation of the value of the put option will be a function of the price of the call option for the respective asset under the same conditions.

The formula for determining the price of a put option shall be as follows:

where:

C - The price of the call option, calculated according to the Black-Scholes model;

X - The price of exercising the option (Strike price);

e - 2.71828, the basis of the natural logarithmic function;

r - Risk-free interest rate;

T - The term to maturity of the option in years;

 $Xe^{-rT} = PV(X) - The present value of the Strike price;$ 

S<sub>0</sub> - Current price of the underlying asset (the one for which the option is being constituted)

Calculation of the price of the call option ("C") for the respective asset having the same parameters (Black-Scholes formula):

$$C_0=S_0N(d_1)-Xe^{-rT}N(d_2),$$

where:

$$d_1 = \frac{\ln(S_0/X) + (r + \sigma^2/2)T}{\sigma\sqrt{T}},$$

$$d_2 = d_1 - \sigma \sqrt{T}$$

and where:

C<sub>0</sub> - The current value of the call option;

S<sub>0</sub> - The current price of the underlying asset.

N (d) - The probability that a random experiment on the standard normal distribution has a value less than d. The corresponding values can be found in tables with the values of the normal distribution.

X - The price of exercising the option;

e - 2.71828, the basis of the natural logarithmic function;

r - Risk-free interest rate;

T - The term to maturity of the option in years;

 $Xe^{-rT} = PV(X) - The present value of the Strike price;$ 

In - The natural logarithmic function;

 $\sigma$  - The standard deviation of the rate of return on an annual basis (permanently capitalized) of the underlying asset (volatility).

The standard deviation of the rate of return for n observations shall be calculated by the formula:

$$\sigma = \sqrt{\frac{n}{n-1}\sum_{t=1}^{n}\frac{\left(r_{t}-\bar{r}\right)^{2}}{n}} \ ,$$

where  $\bar{r}$  is the average return for the sampling period. The rate of return on day t shall be determined according to the constant capitalization where  $r_t = \ln (S_t / S_{t-1})$ .

**2.6.** In the event that the methods set out in paragraphs 2.3 and 2.4 cannot be applied, the ex-post evaluation of the fair value of futures admitted to or traded on active regulated markets, the ex-post evaluation shall be performed as follows:

$$F = {S - PV(D,0,T)}^* (1+Rf)^T,$$

where:

F - the price of a futures contract;

S-

the spot price of the underlying asset;

PV (D, 0, T) - the present value of the expected dividend;

Rf - risk-free interest rate:

T - number of days of the contract divided by 365.

- **2.7.** The ex-post evaluation of the fair value of derivative financial instruments traded over-the-counter (OTC) shall be performed at the arithmetic mean bid price and ask price, announced through an electronic system for price information of financial instruments at market closing on the business day the evaluation is performed. If this rule cannot be applied:
- (a) an ex-post evaluation of options traded over-the-counter shall be performed using the formula set out in point 2.5;
- (b) the ex-post evaluation of foreign exchange forward contracts shall be performed using the formula below. When the term to maturity of foreign exchange forward contracts is less than 1 month and in case of insignificant differences in interest rates due to the short term and negligible influence of discount factors, it shall be assumed that the forward exchange rate as at the date of the ex-post evaluation (t) is equal to the current spot exchange rate.

$$V_{t} = N \times \left( \frac{C}{\left(1 + i_{A}\right)^{(T-t)}} - \frac{P}{\left(1 + i_{B}\right)^{(T-t)}} \right)$$

where:

Vt - value of the forward contract;

N - amount of the forward contract:

C - the current spot rate between the two currencies;

P - forward exchange rate agreed upon at the conclusion of the forward contract;

Both exchange rates are expressed as units of currency B for one unit of currency A.

iA - risk-free interest rate for currency A;

iB - risk-free interest rate for currency B;

T - maturity date of the forward contract;

t - current date.

- c) the ex-post evaluation of forwards other than those referred to in item b), shall be performed using the formula specified in point 2.6.
- **2.8.** Ex-post evaluation of financial instruments admitted to trading on more than one active regulated market shall be performed at prices publicly disclosed by the regulated market to which the Management Company has access and the financial instrument was initially purchased. Should the financial instrument is purchased on more than one active regulated market, the ex-post evaluation

shall be performed at prices publicly announced by the regulated market on which the largest volume of the respective financial instrument was traded on the same day.

**2.9.** In cases where trading on a regulated market is not conducted on business days for Bulgaria or where certain financial instruments are temporarily suspended from trading, the ex-post evaluation of financial instruments admitted to or traded on an active regulated market shall be the evaluation valid for the day of the last trading session as at the date to which the evaluation refers to.

The rule also applies in cases where a trading session is not held on a regulated market due to a non-business day in the respective country, which is a business day in Bulgaria.

The rule shall not apply when trading sessions are not held on the regulated market for more than 5 business days. In this case the ex-post evaluation shall be performed with the respective application of points 2.5 and 2.6.

- **2.10.** For the purposes of this section, an "active market" in financial instruments shall be considered a market to which the Management Company has access and which meets the following requirements:
- a) pricing information for financial instruments is easily accessible and regularly available from a pricing system, and results from actual and regular fair transactions;
  - b) the price is formed between a willing buyer and a willing seller in a fair deal.
- **3.** (*Amended since 20.11.2020*) For accounting purposes, the financial assets in the portfolio of a Sub-Fund, denominated in a foreign currency, shall be converted into BGN equivalent as per the official exchange rate of the Bulgarian National Bank, valid for the day to which the evaluation refers to.

### IV. MEASUREMENT OF LIABILITIES

The value of the liabilities is equal to the amount of the carrying amounts of the short-term and long-term liabilities on the balance sheet of a Sub-Fund. Liabilities denominated in a foreign currency shall be calculated as per the official exchange rate of the Bulgarian National Bank, valid for the day on which the valuation is performed. Liabilities of a Sub-Fund shall be valued in accordance with IFRS and the Umbrella Fund's accounting policies.

### V. NET ASSET VALUE

The NAV of a Sub-Fund is equal to the amount of its assets less the amount of its liabilities.

The NAV per unit is equal to the NAV divided by the number of units in circulation of a Sub-Fund.

The Issue Price ("IP") per unit is equal to the NAV per unit increased by the issue fee, if such is provided for in the Umbrella Fund Rules, while the redemption value ("RV") per unit is equal to the NAV per unit, reduced by the redemption fee, if such is provided in the Rules of the Umbrella Fund.

### VI. PROCEDURE FOR CALCULATING NAV, IP AND RV

The NAV of each Sub-Fund shall be determined on each business day ("the day on which the evaluation is carried out" or "T + 1" day) for the preceding day ("the day as at which the evaluation is carried out" or "T" day). The procedure for determining the NAV, NAV per unit, IP and RV of the units of each Sub-Fund is as follows:

- (a) By 10:00 am on the day on which the evaluation is made (day "T + 1"), the Branch shall receive from the distributor of the Umbrella Fund "United Bulgarian Bank" AD (in its capacity as "**Distributor**") information about the sale and redemption transactions of units of each Sub-Fund with completed settlement and the number of units in circulation for each Sub-Fund at the end of day "T";
  - (b) Between 10:00 and 13:00 on day "T + 1":
  - the fair value of the assets of each Sub-Fund shall be determined for day T; the data and / or analyzes used in determining the fair value shall be applied to the calculation of the relevant price;
  - the assets of each Sub-Fund shall be re-evaluated at fair value, the balance sheet of each Sub-Fund shall be prepared and the NAV per unit, the IP and the RV for each Sub-Fund for day T shall be determined.
- (c) By 13:00 on day "T + 1" the Branch shall provide the Depositary Bank with all information on the determined NAV of each Sub-Fund (including the number of units sold and redeemed with completed settlement), as well as on the calculated IP and RV.
- (d) By 14:00 on day "T + 1" the Branch shall receive confirmation by the Depositary Bank for the calculated NSA, IP and RV.
- (e) The Branch, by 17:00 on day "T + 1", shall announce the NAV, IP and RV for each Sub-Fund for day "T".
- (f) (Amended since 11.04.2022) The Branch shall provide the Financial Supervision Commission with summary information on the IP and the RV of the units of each Sub-Fund once a month within three business days as from the end of the month.
- (g) In calculating the NAV, IP and RV, the Branch shall use appropriate software that allows it to keep the Umbrella Fund's accounting separately from its own accounting.
- (h) All documentation and information used to determine the NAV, IP and RV for each Sub-Fund shall be kept by the Branch on a paper, magnetic, optical or other technical media for at least 5 years, in a way that provides access only to the authorized persons. For extra security, the information shall be stored on a second magnetic medium.
- (i) The net asset value, the issue price and the redemption price of the units of each Sub-Fund for a given "T" day shall be published by 17:00 on the next "T + 1" business day on the Branch's website and on the Distributor's website.

# VII. ERRORS IN THE CALCULATION OF IP AND / OR RV

Should an error has been made in calculating the NAV per unit, as a result of which the IP has been increased or the RV has been lowered by more than 0.5% of the NAV per unit, the Management Company or the Depositary Bank shall, as the case may be, restore the difference to the unit-holders who bought units at an increased IP, respectively sold back their units at a reduced RV, at the expense of the affected Sub-Fund within 10 days of finding the error, unless the unit-holder has acted in bad faith.

If an error is made in calculating the net NAV per unit, as a result of which the IP is lowered or the RV is increased by more than 0.5% of the NAV per unit, the Management Company or the Depositary Bank, as the case may be, are obliged to reimburse the aggrieved Sub-Fund the amount due for its own account within 10 days as from date on which the error is established.

# **VIII. MAJOR SOURCES OF INFORMATION**

(*Amended since 20.11.2020*) The following major sources of information are used to determine the NAV of the Sub-Funds:

- Information on the NAV per share in the Master Sub-Funds received by the Master Umbrella Fund, the Master Sub-Fund, their depository bank or management company;
- Recently published NAV data per unit in the Master Sub-Funds, in case of delay in publishing and / or transmitting information on the NAV per unit in a General Sub-Fund, published at <a href="https://www.kbc.be/retail/en/legal-information/investment-legal-documents/key-investor-information-document-kiid.html?zone=topnav">https://www.kbc.be/retail/en/legal-information/investment-legal-documents/key-investor-information-document-kiid.html?zone=topnav</a>;
- ➤ Information received from Central Depository AD as regards the number of units in circulation of the Sub-Funds and other relevant information received from Central Depository AD;
- > The latest annual and semi-annual financial statements of the Master Umbrella Fund:
- Official Exchange Bulletin or similar sources of information maintained by a trading venue used by the Management Company on behalf of a Sub-Fund;
- Quotes from Reuters, Bloomberg and other standard electronic systems for price information of assets traded or admitted to trading on a local or foreign trading venue and / or traded overthe-counter. In case the Management Company does not have direct access to such electronic systems, access could be provided through banks, investment firms or other financial companies, incl. KBC companies;
- Official statistical and reference information;
- Analyzes, publications and comments of certified Bulgarian and foreign consultants and analysts.

The following sources of information may be used in determining the NAV of the Sub-Funds:

- Prospectus of the Master Umbrella Fund;
- Decisions for transformation (by a merger or a takeover) of the Master Umbrella Fund or Master Sub-Fund;
- Decisions for liquidation of the Master Umbrella Fund or Master Sub-Fund;
- Changes in the rules or articles of association of the Master Umbrella Fund:
- Legal proceedings initiated where the Master Umbrella Fund or the Master Sub-Fund is the defendant;
- Analysis of the general economic situation of the country / countries in which the Master Sub-Fund invests:
- Analysis of the general status of the market on which financial instruments are traded;
- > Public and / or subscription-based information on transactions and quotes for transactions in financial instruments, including on the over-the-counter market.

Present Rules have been adopted by Decision of the Executive Committee of KBC Asset Management N.V. since 11 August 2020, and have been amended by a decision of 20 November 2020 and 16 November 2021, the amendments adopted by decision of 16.11.2021 coming into force after obtaining authorisation by the Financial Supervision Commission to organise and manage the following Sub-Funds: UBB ExpertEase SRI Defensive Conservative (with new name UBB ExpertEase Defensive Conservative Responsible Investing), UBB ExpertEase SRI Defensive Balanced (with new name UBB ExpertEase Defensive Balanced Responsible Investing), UBB ExpertEase SRI Dynamic Balanced (with new name UBB ExpertEase Dynamic Balanced Responsible Investing), UBB ExpertEase SRI Defensive Tolerant (with new name UBB ExpertEase Defensive Tolerant Responsible Investing), UBB ExpertEase SRI Dynamic Tolerant (with new name UBB ExpertEase Dynamic Tolerant Responsible Investing) and UBB ExpertEase SRI Highly Dynamic Tolerant (with new name UBB ExpertEase Highly Dynamic Tolerant Responsible Investing), amended by a decision of the Senior Management of KBC ASSET MANAGEMENT N.V. - KLON, Bulgaria dated 11.04.2022, 06.01.2023, 20.01.2023, 07.04.2023.

# **Annex 2**

# For UBB ExpertEase Defensive Conservative Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

UBB ExpertEase Defensive Conservative Responsible Investing

Legal entity identifier/ISIN: 485100CQNJKFESR6CB32/BG9000006221

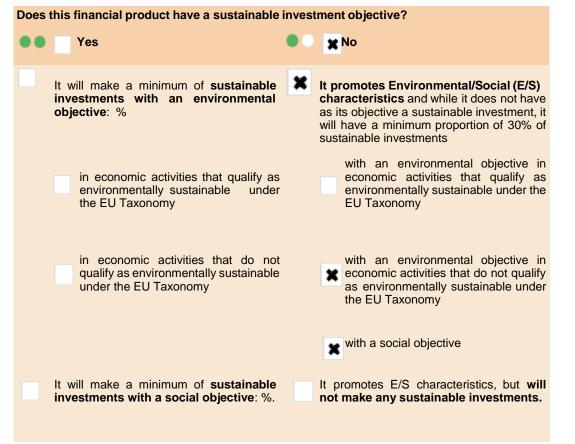
# Environmental and/or social characteristics

# Sustainable investment means an investment in an economic activity that contributes to

an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU-Taxonomie is a classification system laid down in Regulation (EU) 2020/852, establishing a list of environmentally sustainable economic activities.
That Regulation

That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.





What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Defensive Conservative Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master sun-fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities. This sub-fund:

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
  - promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective	
Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".	
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.	
Bonds financing green and/or social projects		
Instruments issued by governments, supranational debtors and/or agencies linked to governments		
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.	
Bonds financing green and/or social projects		
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.	
Other specific objectives	Not applicable.	

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

# (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

· In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- · attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - · overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019.

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

# (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- Indicator 15: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

#### ×

#### Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

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

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

# Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

#### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

# What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

# O

# What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Good governance

employee relations,

remuneration of

staff and tax compliance.

practices include

management

structures,

sound

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

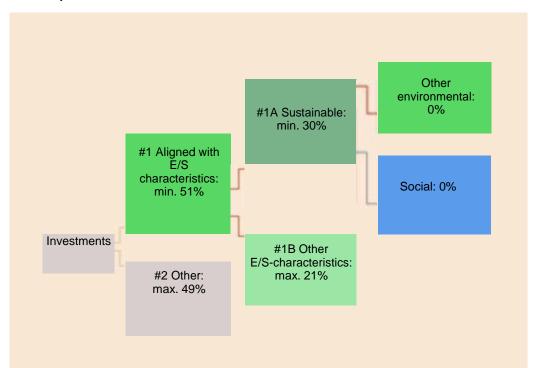
# -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

# -operational expenditure

(OpEx) reflecting green operational activities of investee

companies.



**#1** Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

# How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy (\*)?

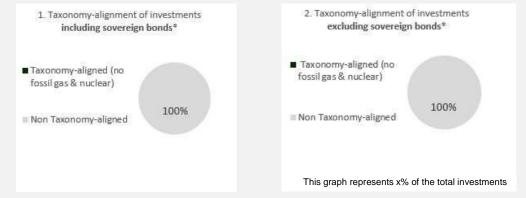
Yes

in fossil gas in nuclear energy

No

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

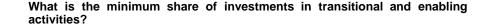
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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



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

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

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



Not applicable.

(1)



are sustainable

investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU-

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially

sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Conservative Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-def-conserv/documents

# Annex 3

# For UBB ExpertEase Defensive Balanced Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

UBB ExpertEase Defensive Balanced Responsible Investing

Legal entity identifier/ISIN:

485100CQNJKFESR6CB32/BG9000005223

# Environmental and/or social characteristics

#### Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee

companies

practices.

The EU-Taxonomie is classification system laid down in Regulation (EU) 2020/852. establishing a list of environmentally sustainable economic activities. Regulation That

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





What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Defensive Balanced Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master Fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities.

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
- promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective	
Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".	
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.	
Bonds financing green and/or social projects	· · · · · · · · · · · · · · · · · · ·	
Instruments issued by governments, supranational debtors and/or agencies linked to governments		
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.	
Bonds financing green and/or social projects		
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.	
Other specific objectives	Not applicable.	

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

# (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

· In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - · overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

# (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- **Indicator 15**: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

# ×

#### Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

N



# What investment strategy does this financial product follow?

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

# Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

# What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

# What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Good governance

employee relations,

remuneration of

staff and tax compliance.

practices include

management

structures,

sound

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

# -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

# -operational expenditure (OpEx) reflecting

(OpEx) reflecting green operational activities of investee

companies.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category #1A Sustainable covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

### How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy (\*)?

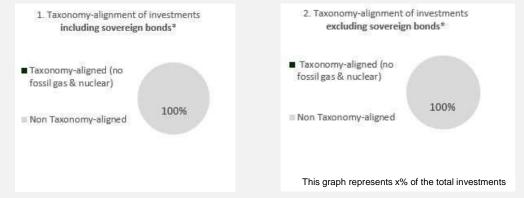
Yes

in fossil gas in nuclear energy

No

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



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

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

Not applicable.

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

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



sustainable
investments with
an environmental
objective that do
not take into
account the
criteria for
environmentally
sustainable
economic activities
under the EU-

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-def-bal/documents

# Annex 4

# For UBB ExpertEase Defensive Tolerant Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

UBB ExpertEase Defensive Tolerant Responsible Investing

Legal entity identifier/ISIN: 485100CQNJKFESR6CB32/BG9000004226

# Environmental and/or social characteristics

Does this financial product have a sustainable investment objective? Sustainable investment means × No an investment in an Yes economic activity that contributes to It will make a minimum of sustainable It promotes Environmental/Social (E/S) an environmental or social objective, investments with an environmental characteristics and while it does not have provided that the as its objective a sustainable investment, it objective: % investment does not will have a minimum proportion of 30% of significantly harm sustainable investments any environmental or social objective with an environmental objective in and that economic activities that qualify as in economic activities that qualify as investee environmentally sustainable environmentally sustainable under the follow companies **EU Taxonomy** good governance the EU Taxonomy practices. The EUin economic activities that do not with an environmental objective in Taxonomie is economic activities that do not qualify qualify as environmentally sustainable classification system laid down in under the EU Taxonomy as environmentally sustainable under Regulation (EU) the EU Taxonomy 2020/852. establishing a list of environmentally with a social objective sustainable economic activities. That Regulation It will make a minimum of sustainable It promotes E/S characteristics, but will does not include a investments with a social objective: %. not make any sustainable investments. list of socially sustainable economic activities.



What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Defensive Tolerant Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master Fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities.

This sub-fund:

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
- promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective	
Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".	
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.	
Bonds financing green and/or social projects	A minimum of 10% of the corporate bonds invested in should qualify as bonds to finance green and/or social projects.	
Instruments issued by governments, supranational debtors and/or agencies linked to governments		
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.	
Bonds financing green and/or social projects	A minimum of 10% of the investments in bonds issued by governments, supranational debtors and/or agencies linked to governments should qualify as bonds financing green and/or social projects.	
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.	
Other specific objectives	Not applicable.	

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

### (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

• In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

(8)

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- · attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - · overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

# (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- **Indicator 15**: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

# ×

#### Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

N



# What investment strategy does this financial product follow?

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

# Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

# What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

# O

# What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

Good governance practices include sound management structures, employee relations, remuneration of

staff and tax compliance.

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

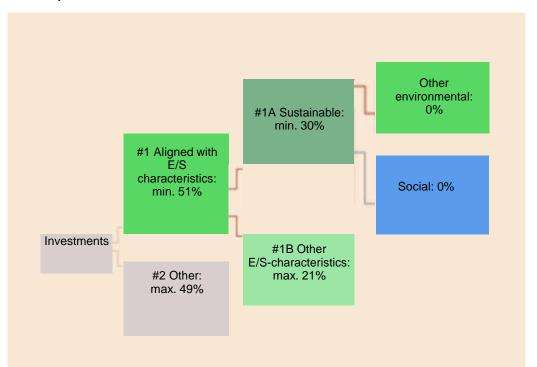
# -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

# -operational expenditure

(OpEx) reflecting green operational activities of investee

companies.



**#1** Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

# How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy (1)?

Yes

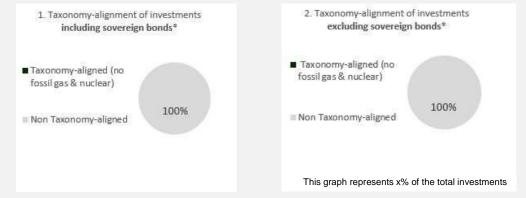
in fossil gas in nuclear energy

No

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where the

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

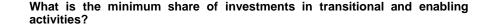
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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



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

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

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



Not applicable.

0



are sustainable

investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU-

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially

sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Defensive Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-def-tol/documents

### Annex 5

### For UBB ExpertEase Dynamic Balanced Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

That

list of

sustainable economic activities. Sustainable investments an environmental objective might be aligned with the Taxonomy or not.

Regulation

socially

does not include a

UBB ExpertEase Dynamic Balanced Responsible Investing

Legal entity identifier/ISIN: 485100CQNJKFESR6CB32/BG9000003228

It promotes E/S characteristics, but will

not make any sustainable investments.

### Environmental and/or social characteristics

#### Sustainable Does this financial product have a sustainable investment objective? investment means an investment in an Yes × No economic activity that contributes to It will make a minimum of sustainable It promotes Environmental/Social (E/S) environmental an investments with an environmental or social objective, characteristics and while it does not have provided that the objective: % as its objective a sustainable investment, it investment does not will have a minimum proportion of 30% of significantly harm sustainable investments any environmental or social objective with an environmental objective in that and economic activities that qualify as in economic activities that qualify as investee environmentally sustainable environmentally sustainable under the follow companies good governance the EU Taxonomy **EU Taxonomy** practices. EU-The in economic activities that do not with an environmental objective in Taxonomie is qualify as environmentally sustainable economic activities that do not qualify classification system laid down in under the EU Taxonomy x as environmentally sustainable under Regulation (EU) the EU Taxonomy 2020/852, establishing a list of environmentally with a social objective sustainable economic activities.

It will make a minimum of sustainable

investments with a social objective: %.



What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Dynamic Balanced Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master Fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities.

This sub-fund:

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
- promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective		
Instruments issued	Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".		
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.		
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.		
Bonds financing green and/or social projects	· · · · · · · · · · · · · · · · · · ·		
Instruments issued by governments, supranational debtors and/or agencies linked to governments			
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).		
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).		
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.		
Bonds financing green and/or social projects	A minimum of 10% of the investments in bonds issued by governments, supranational debtors and/or agencies linked to governments should qualify as bonds financing green and/or social projects.		
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.		
Other specific objectives	Not applicable.		

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

#### (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

• In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

(8)

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - · overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

#### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

#### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

#### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

### (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- Indicator 15: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

#### ×

Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

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

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

### Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

#### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

### What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

Good governance

employee relations,

remuneration of

staff and tax compliance.

practices include

management

structures,

sound

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

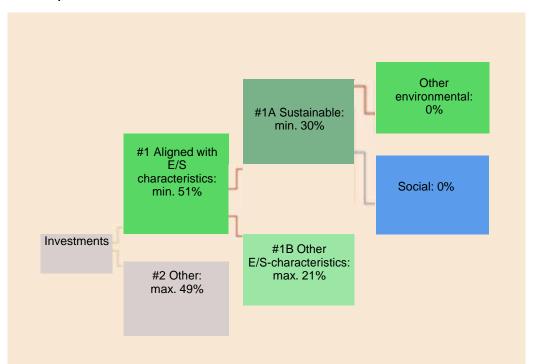
### -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

# -operational expenditure

(OpEx) reflecting green operational activities of investee

companies.



**#1** Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

# How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy (1)?

Yes

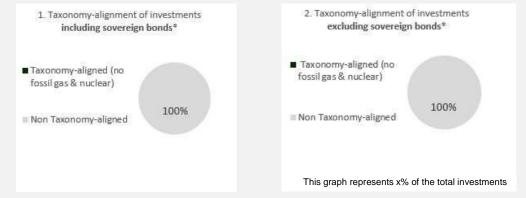
in fossil gas in nuclear energy

No

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

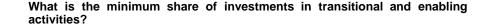
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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



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

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

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



Not applicable.

0



(B)

are sustainable

investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU-

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially

sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Balanced Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-dyn-bal/documents

### Annex 6

### For UBB ExpertEase Dynamic Tolerant Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

UBB ExpertEase Dynamic Tolerant Responsible Investing

Legal entity identifier/ISIN: 485100CQNJKFESR6CB32/BG9000002220

### Environmental and/or social characteristics

#### Sustainable Does this financial product have a sustainable investment objective? investment means an investment in an Yes × No economic activity that contributes to environmental It will make a minimum of sustainable It promotes Environmental/Social (E/S) an investments with an environmental or social objective, characteristics and while it does not have provided that the objective: % as its objective a sustainable investment, it investment does not will have a minimum proportion of 30% of significantly harm sustainable investments any environmental or social objective with an environmental objective in that and economic activities that qualify as in economic activities that qualify as investee environmentally sustainable environmentally sustainable under the follow companies good governance the EU Taxonomy **EU Taxonomy** practices. EU-The in economic activities that do not with an environmental objective in Taxonomie is qualify as environmentally sustainable economic activities that do not qualify classification system laid down in under the EU Taxonomy x as environmentally sustainable under Regulation (EU) the EU Taxonomy 2020/852, establishing a list of environmentally with a social objective sustainable economic activities. That Regulation It will make a minimum of sustainable It promotes E/S characteristics, but will does not include a investments with a social objective: %. not make any sustainable investments. list of socially sustainable



What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Dynamic Tolerant Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master Fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities.

This sub-fund:

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
- promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective	
Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".	
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.	
Bonds financing green and/or social projects		
Instruments issued by governments, supranational debtors and/or agencies linked to governments		
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.	
Bonds financing green and/or social projects		
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.	
Other specific objectives	Not applicable.	

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

### (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

· In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

#### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

#### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

#### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

### (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- Indicator 15: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

#### ×

#### Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

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

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

### Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

#### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

# What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in soecific assets.

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

Good governance practices include sound management structures, employee relations, remuneration of

staff and tax compliance.

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

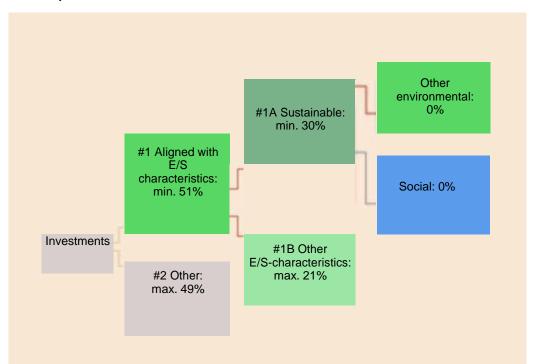
### -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

### -operational expenditure

(OpEx) reflecting green operational activities of investee

companies.



**#1** Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

# How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy (1)?

Yes

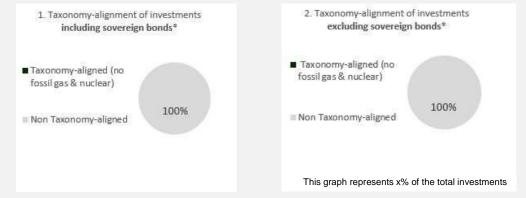
in fossil gas in nuclear energy

No

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they

(1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

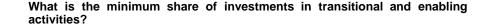
The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial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



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

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

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



Not applicable.

0



(B)

are sustainable

investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU-

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially

sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-dyn-tol/documents

### **Annex 7**

### For UBB ExpertEase Highly Dynamic Tolerant Responsible Investing

Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and article 6, first paragraph of Regulation (EU) 2020/852

**Product Name:** 

Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

UBB ExpertEase Highly Dynamic Tolerant Responsible Investing

Legal entity identifier/ISIN: 485100CQNJKFESR6CB32/BG9000001222

### Environmental and/or social characteristics

#### Sustainable Does this financial product have a sustainable investment objective? investment means an investment in an × No Yes economic activity that contributes to It will make a minimum of sustainable It promotes Environmental/Social (E/S) environmental or social objective, investments with an environmental characteristics and while it does not have provided that the objective: % as its objective a sustainable investment, it investment does not will have a minimum proportion of 30% of significantly harm sustainable investments any environmental or social objective with an environmental objective in and that the in economic activities that qualify as economic activities that qualify as investee environmentally sustainable environmentally sustainable under the companies follow good governance the EU Taxonomy **EU Taxonomy** practices. The EUin economic activities that do not with an environmental objective in Taxonomie economic activities that do not qualify qualify as environmentally sustainable classification as environmentally sustainable under under the EU Taxonomy system laid down in Regulation (EU) the EU Taxonomy 2020/852 establishing a list of environmentally with a social objective sustainable economic activities. Regulation That It will make a minimum of sustainable It promotes E/S characteristics, but will does not include a investments with a social objective: %. not make any sustainable investments. socially list of sustainable economic activities.



What environmental and/or social characteristics are promoted by this financial product?

This sub-fund is a Feeder fund of the Master sub-fund Horizon KBC Highly Dynamic Tolerant Responsible Investing, Institutional F share BG class shares, denominated in euro, which is an investment division of Horizon N.V. (Horizon N.V.), an open-ended investment company duly incorporated and existing under the laws of Belgium. The following information related to the ESG characteristics is aligned with the information for the Master Fund.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of 30% of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments'). The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy framework. The percentage invested at all times in environmentally sustainable activities within the meaning of the Taxonomy framework is 0%. The underlying investments of this sub-fund do not take into account the EU risk criteria for environmentally sustainable economic activities. This sub-fund:

- promotes the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments) by preferring issuers with a better ESG (risk)score;
- promotes climate change mitigation by preferring issuers with lower carbon intensity, with the

objective of meeting a predetermined carbon intensity target;

- supports sustainable development by including issuers that contribute towards achieving the UN Sustainable Development Goals;
- supports sustainable development by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

The concrete objectives of the sub-fund are:

	Objective	
Instruments issued by companies		
ESG risk score	10% better than the target allocation as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".	
Carbon Intensity	A reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at end of 2019. An immediate reduction of 30% is envisaged for 2019, followed by an annual reduction of 3%.	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by companies should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds within the corporate bonds part.	
Bonds financing green and/or social projects		
Instruments issued by governments, supranational debtors and/or agencies linked to governments		
ESG Score	10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
Carbon Intensity	25% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).	
UN Sustainable Development Goals	A minimum of 60% of the investments in instruments issued by governments, supranational debtors and/or agencies linked to governments should contribute to UN Sustainable Development Goals, including the green, social & sustainability bonds according to internal screening.	
Bonds financing green and/or social projects		
Minimum % Sustainable Investments	A minimum of 30% of sustainable investments.	
Other specific objectives	Not applicable.	

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds is used as a basis for comparison, to compare certain ESG characteristics promoted by the sub-fund.

What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?

#### (1) Indicators related to the ESG-score

The contribution to the integration of sustainability into policy decisions of the issuers is measured based on an ESG (risk) score. This score represents the aggregated performance assessment of a given entity with respect to general environmental, social and governance themes. The main factors underpinning the ESG criteria are:

• In the case of instruments issued by companies:

Sustainability indicators measure how the environmental or social characteristics

(8)

promoted by the financial product are attained.

- respect for the environment (e.g. reduction in greenhouse gas emissions);
- attention to society (e.g. employee working conditions); and
- corporate governance (e.g. independence and diversity of the board of directors).

The ESG risk score is a measure of a company's environmental, social and governance (ESG) risks. To determine this score, relevant key ESG issues for the sub-sector in question are considered, along with the quality of the company's management team and any possible ESG controversies involving the company in the recent past. The ESG risk score for companies measures the difference between a company's exposure to ESG risks relevant to its sector and the extent to which a company hedges those risks. The lower a company's ESG risk score on a scale of 0 to 100, the less its sustainability risk. The ESG risk scores for companies are based on data supplied by data provider Sustainalytics.

In addition to excluding companies with a severe ESG risk (i.e. an ESG risk rating > 40), the subfund will promote best practices by using an overall ESG risk score that is 10% below that of the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

- In the case of instruments issued by national governments, supranational debtors and/or agencies linked to governments five pillars, each of which is given equal weighting:
  - overall economic performance and stability (e.g. quality of institutions and government);
  - socio-economic development and health of the population (e.g. education and employment);
  - equality, freedom and the rights of all citizens;
  - · environmental policy (e.g. climate change); and
  - · security, peace and international relations.

These lists of factors underpinning the ESG criteria are not exhaustive and may be changed under the supervision of the Responsible Investing Advisory Board.

The ESG score for countries assesses how well countries' public policies perform in environmental, social and good governance terms. The higher a country's ESG score on a scale of 0 to 100, the more it is committed to sustainable development. In addition to excluding the worst rated 10%, the sub-fund will promote best practices by using an overall ESG score that is 10% better than the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR).

The ESG objectives will be evaluated annually and may be adjusted. External circumstances such as market movements and updates of data regarding the ESG-(risk)score can lead to investment solutions failing to achieve this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest. For supranational bonds, the Responsible Investing research team will assign an ESG score that is a weighted average of the member states, with the weightings being determined by voting rights, paid-in capital or percentage of the population.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

#### (2) Indicators related to the carbon intensity

The objective to promote climate change mitigation by preferring issuers with lower carbon intensity in order to reach a predetermined carbon intensity objective, applies to at least 90% of the portfolio. The objective does not apply to issuers for which data is not available.

More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. The contribution of issuers to climate change mitigation is measured based on their carbon intensity. For companies, carbon intensity is defined as absolute greenhouse gas emissions (in tonnes CO2 equivalent) divided by revenues (in million USD). For countries, it is defined as greenhouse gas emissions (in tonnes CO2 equivalent) divided by the Gross Domestic Product (in million USD).

The objectives for instruments issued by companies differ from those for instruments issued by national governments, supranational debtors and/or government-linked agencies.

The number of tonnes of CO2 emitted by a company is the sum of:

- · the direct CO2 emissions resulting from the company's own activities (scope 1); and
- the indirect CO2 emissions resulting from the generation of purchased electricity (scope 2). The indirect CO2 emissions resulting from the activities of suppliers and customers, for example (scope 3), are not included in the sum. Carbon intensity calculations are based on data sourced from Trucost. Within the sub-fund, the carbon intensity score based on scope 1 and scope 2 emissions is assigned to at least 90% of the companies in the sub-fund.

The sub-fund aims for a reduction of 50% by 2030 compared to the target allocation described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund" at the end of 2019.

An immediate reduction of 30% is implemented for 2019, followed by a 3% reduction on an annual basis. The portfolio's weighted average will be assessed against that trajectory. Carbon intensity

at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. This calculation does not take technical items such as cash and derivatives into account, and companies without data are also excluded. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The companies for which no data is available are included in the negative screening and given an overall ESG risk rating. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this target trajectory. In that case the investment solution will be adapted to meet the trajectory again within a time frame that takes into account the client's best interest.

The number of tonnes of CO2 emitted by a country is the sum of:

- the CO2 emissions resulting from the domestic production of goods and services for domestic consumption and for export; and
- the CO2 emissions resulting from the import of goods and services, back to the country of origin.

KBC Asset Management NV takes a broad approach to a government as a regulator of all economic activities within its territory. KBC Asset Management NV measures territorial emissions and emissions related to imports, as reported by PRIMAP. PRIMAP's dataset combines several published datasets into a comprehensive set of greenhouse gas emission trajectories. GDP figures in millions of USD are based on data of the International Monetary Fund (IMF). The carbon intensity score is assigned to at least 90% of the assets in the sub-fund, excluding cash, derivatives and countries without data. Carbon intensity at the portfolio level is calculated based on the weighted average of the carbon intensity of the positions in the sub-fund. The weights used in the calculation depend on the size of the positions in the sub-fund, rescaled for the items without data. The countries for which no data is available are included in the negative screening and given an overall ESG rating.

For government bonds, the sub-fund targets a 25% improvement on the current carbon intensity score of the reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR). This improvement is dependent on the regional allocation, determined by the benchmark. External circumstances such as market movements and updates of data regarding the carbon intensity can lead to investment solutions not meeting this objective. In that case the investment solution will be adapted to meet the objective again within a time frame that takes into account the client's best interest.

For supranational bonds, the Responsible Investing research team will assign a carbon intensity score that is a weighted average of member states, with weightings determined by voting power, paid-in capital or percentage of population.

Carbon intensity targets are monitored and evaluated annually. The targets can be revised upwards or downwards. For example, if companies and/or countries do not show sufficient progress in reducing their carbon intensity and if this cannot be compensated for through portfolio optimisation, KBC Asset Management NV may be forced to adjust the target upwards. It is also possible that at some point the carbon intensity will reach a lower level much faster than expected. When companies and/or countries make very good progress in terms of carbon intensity, KBC Asset Management NV wants to be able to follow that acceleration in the portfolio. In that case the target can be adjusted downwards.

#### (3) Indicators related to the UN Sustainable Development Goals

To support sustainable development, the sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the achievement of the UN Sustainable Development Goals. The UN Sustainable Development Goals include both social and environmental objectives. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'. Companies that contribute to the UN Sustainable Development Goals are defined as those that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals.

Governments are assessed on the five pillars as described in the ESG score, which contain indicators that can be linked to the 17 UN Sustainable Development Goals. If a government scores sufficiently well on one of these pillars and not significantly poor on the other pillars, the bonds of this government and its sub-governments and agencies are considered to be instruments that contribute to UN Sustainable Development Goals.

In order to be considered as contributing to the UN Sustainable Development Goals, a country should meet the following two conditions:

- The country is aligned with the ESG criteria: it has a score of at least 80 for one of the five pillars and does not score lower than 50 for any of the other pillars;
- The country is not excluded: it does not rank among the 50% most controversial regimes AND it does meet the criteria on respecting the sustainable principles AND it does not rank among the 10% worst scoring countries of the universe.

Supranational government bonds are considered to contribute to the UN Sustainable Development Goals if either of the following criteria is met:

- at least half of its members contribute to the UN Sustainable Development Goals (weighted by voting power/full paid-in capital/percentage of population (in order of availability).
- the mission statement of the supranational institution has a sustainable objective and less than half of its members fall in the worst-scoring half of the screening for controversial regimes.

In addition, the Responsible Investing Advisory Board can award the "sustainable development" label to instruments of companies.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of issuers contributing to the achievement of the UN Sustainable Development Goals may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by countries/companies with regard to sustainability.

#### (4) Indicators related to bonds to finance green and/or social projects

To promote the transition to a more sustainable world, the sub-fund commits to invest a minimum portion of the portfolio in bonds to finance green and/or social projects. More information on the sub-fund's concrete objectives can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

The targets are checked and evaluated annually. The targets can be revised upwards or downwards. The minimum percentage of bonds to finance green and/or social projects may be revised to take into account any stricter requirements that KBC Asset Management NV wishes to impose on the sub-fund. Therefore, the revision will depend on the future development of the responsible investment strategy, but also on the progress made by companies/countries with regard to sustainability.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

#### (1) UN Sustainable Development Goals

The sub-fund commits to investing a minimum proportion of the portfolio in issuers that contribute to the UN Sustainable Development Goals to support sustainable development.

More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Instruments of companies that are aligned with at least one of the 15 first UN Sustainable Development Goals, while not being misaligned with any of these UN Sustainable Development Goals, are designated as "sustainable investments".

Instruments of governments, supranational debtors and/or government-linked agencies that contribute to the UN's sustainable development goals in accordance with what is explained in the section "What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?" of this appendix also qualify as "sustainable investments".

In addition, the Responsible Investing Advisory Board can award the 'sustainable development' label to instruments of companies.

### (2) Bonds financing green and/or social projects

To encourage the transition to a more sustainable world, the sub-fund commits to invest a minimum proportion of the portfolio in bonds financing green and/or social projects. More information about the concrete objectives of the sub-fund can be found in the summary table in the section 'What environmental and/or social characteristics are promoted by this financial product?'.

Bonds whose proceeds will be used exclusively to finance (a combination of) green and social projects that are aligned with the International Capital Market Association (ICMA) Green Bond Principles and Social Bond Principles on the Use of Proceeds are considered bonds financing green and/or social projects. Compliance with these principles is verified by an external party. Instruments that meet these requirements are labelled 'sustainable investments'.



How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Principal adverse

The sustainable investments that the sub-fund partially intends to make do not cause significant

impacts are the significant most negative impacts of investment decisions sustainability factors relating to environmental, and social employee matters, respect for human rights, anti corruption antibribery matters.

harm to the sustainable investment objective due to negative screening.

The sub-fund takes into account all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation (EU) 2022/1288 and the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 through the negative screening.

The negative screening entails the advance exclusion from the responsible investment universe by the sub-fund of issuers that do not align with the exclusion policies.

The application of these policies means that issuers involved in activities such as fossil fuels, the tobacco industry, arms, gambling and adult entertainment are excluded from the sub-fund's investment universe. Investments in financial instruments linked to livestock and food prices are also excluded, whereas strict criteria apply to companies that are active in the palm oil industry. All companies that derive at least 5% of their revenues from the production or 10% of their revenues from the sale of fur or special leather, are excluded. The negative screening also ensures that issuers based in countries that encourage unfair tax practices, that seriously violate fundamental principles of environmental protection, social responsibility and good governance (through the normative screening, through a poor ESG risk rating, due to involvement in unsustainable countries and controversial regimes) are excluded from the sub-fund's investment universe.

These negative screening principles are not exhaustive and may be modified on the advise of the Responsible Investing Advisory Board.

\_\_\_\_How have the indicators for adverse impacts on sustainability factors been taken into account?

Through the exclusion policy for responsible investment funds, and in particular through the normative screening and ESG risk assessment, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288, are taken into account for instruments issued by companies. The sub-fund does not invest in companies that seriously violate the Principles of the United Nations Global Compact and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises. All companies involved in serious controversies related to environmental, social or good governance issues are excluded as well. Also excluded are companies that deviate significantly (a score of -10) from any of the first 15 UN Sustainable Development Goals (based on MSCI SDG Net Alignment Score), as well as companies with an ESG risk rating of more than 40 according to data provider Sustainalytics.

For investments in instruments issued by countries, all indicators for the principal adverse impacts of the investment decisions on sustainability factors as listed in Table 1 of Annex 1 of the Delegated Regulation 2022/1288 as well as the relevant indicators for the principal adverse impacts of the investment decisions on sustainability factors in Tables 2 and 3 of Annex 1 of the Delegated Regulation 2022/1288 are taken into account by excluding countries belonging to the worst 10% according to the ESG rating model, and by excluding countries that do not comply with the sustainability principles and are exposed to controversial regimes.

On top of the normative screening and the ESG risk assessment, using the positive selection methodology regarding carbon intensity and the exclusions in the exclusion policy for responsible investment funds, the following indicators for adverse impacts on sustainability factors are also taken into account as follows for all investments of this sub-fund:

- Indicator 3: greenhouse gas ('GHG') intensity of investee companies is taken into account through the carbon intensity reduction target for companies.
- Indicator 4: exposure to companies active in the fossil fuel sector is taken into account as the sub-fund does not invest in companies that are active in the fossil fuel sector.
- Indicator 10: Violations of the United Nations Global Compact (UNGC) Principles and the
  Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational
  Enterprises is taken into account as the sub-fund does not invest in companies that seriously
  violate UNGC principles or OECD guidelines.
- Indicator 14: exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) is taken into account as the sub-fund does not invest in companies that are active in controversial weapons.
- Indicator 15: GHG intensity of investee countries is taken into account through the carbon intensity reduction target for sovereign related investments.
- Indicator 16: Investee countries subject to social violations is taken into account as the subfund does not invest in (i) countries not complying with the sustainability principles, and (ii) countries exposed to controversial regimes. More information can be found in the Exclusion policy for responsible investment funds.

In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through the Proxy Voting and Engagement Policy of KBC Asset Management NV. As part of its

commitment to responsible investment, KBC Asset Management NV exercises the voting rights of the shares it manages in accordance with its proxy voting and engagement policy. Where appropriate, KBC Asset Management NV will enter into dialogue with the management of the companies concerned, if necessary before voting.

A complete overview of the indicators for adverse impacts on sustainability factors that the subfund can take into account is included in Annex 1 of Delegated Regulation (EU) 2022/1288.

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

Companies seriously violating the basic good practices in terms of environmental, social and governance issues, as assessed by the UN Global Compact Principles, are excluded from the sub-fund. The United Nations Global Compact has formulated ten guiding sustainability principles regarding human rights, labour, environment and anti-corruption which are part of the internal screening. In addition, KBC AM assesses the companies' involvement in violations of the International Labour Organization's (ILO) Conventions, the OECD Guidelines for multinational enterprises and the UN Guiding Principles on Business and Human Rights.

The sub-fund commits to respect the letter and the spirit of the United Nations Universal Declaration of Human Rights; the principles concerning fundamental rights in the eight International Labour Organisation core conventions as set out in the Declaration on Fundamental Principles and Rights at Work; the UN Declaration on the Rights of Indigenous Peoples; the UK Modern Slavery Act and other international and regional human rights treaties containing internationally recognised standards by which the business sector must abide.

KBC Asset Management NV assesses all companies on the 'Human Rights List' of KBC Group as well as all companies meeting the criteria below:

- a high or severe controversy score related to Human Rights, for subindustries for which Human Rights are considered a high or severe risk.
- a severe controversy score related to Human Rights, for all other subindustries.

Based on this assessment, appropriate measures are taken, ranging from engagement with the companies concerned to selling positions. More information on the Policy on Human Rights can be found on the KBC Asset Management NV website.

More information on negative screening can be found in the section on "How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective" of this annex.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomyaligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do not significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



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

### ×

#### Yes

The principal adverse impacts on sustainability factors are explicitly taken into account for all investments of the sub-fund through the exclusion policies applied. In addition, the principal adverse impacts on sustainability factors are implicitly taken into account through KBC Asset Management NV's proxy voting and engagement policies.

More information on the principal adverse impacts on sustainability factors can be found under the section "How have the indicators for adverse impacts on sustainability factors been taken into account?" of this appendix.

The information on principal adverse impacts on sustainability factors can also be found in the annual report for this sub-fund, published after 1 January 2023.

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

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

The general investment strategy of the sub-fund is described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within the constraints described in the general investment strategy, the sub-fund pursues (directly or indirectly) responsible investment objectives based on a dualistic approach: a negative screening and a positive selection methodology.

More information regarding the negative screening and positive selection methodology can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?' and the section 'What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?' of this annex.

The sub-fund promotes a combination of environmental and social characteristics and, even though it does not have sustainable investments as an objective, it shall invest a minimum proportion of its assets in economic activities that contribute to the achievement of environmental or social objectives (i.e. 'sustainable investments').

The issuers in which it invests must follow good governance practices.

It cannot be ruled out that very limited investments may be made temporarily in assets that no longer contribute to achieving environmental or social objectives promoted by the sub-fund.

Among other things, this can be due to external circumstances, erroneous data, corporate events, and updates to the screening criteria. In these cases, the assets concerned will be replaced with more appropriate assets as quickly as possible, always taking into account the sole interest of the investor. More information can be found in prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

On a continuous basis, the fund manager ensures daily, that risk limits are respected and that current portfolio exposures do not deviate from the targets suggested by the multi-signal model by more than a pre-established acceptable limit. If realignment to the target is necessary, this is normally carried out by using futures in order to keep transaction costs at minimum.

In addition, compliance of the eligible responsible universes is ensured at all times through the use of compliance rules enforced in the front office system.

What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?

The negative screening and positive selection methodology are the binding elements in the selection of investments to achieve each of the environmental or social characteristics promoted by the sub-fund.

### Negative screening

The end result of this negative screening procedure is that the sub-fund excludes issuers in advance from the Responsible Investment universe which fall foul of the exclusion policies that apply to this sub-fund.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

#### The positive selection methodology

The sub-fund will promote the integration of sustainability into the policy decisions of issuers (companies, governments, supranational debtors and/or agencies linked to governments), by preferring issuers with a better ESG (risk)score and promote climate change mitigation, by preferring issuers with lower Carbon Intensity, with the goal of meeting a predetermined carbon intensity target. The sub-fund will also support sustainable development, by including issuers that contribute to the UN Sustainable Development Goals and by encouraging the transition to a more sustainable world via bonds financing green and/or social projects.

More information on the concrete objectives applicable to this sub-fund regarding ESG (risk) score, carbon intensity, UN Sustainable Development Goals and bonds financing green and/or social projects can be found in the overview table under section 'What environmental and/or social characteristics are promoted by this financial product?'.

## What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

There is no committed minimum rate to reduce the scope of the investments considered prior to the application of the abovementioned investment strategy.

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

The four principles regarding good governance practices, i.e. i) sound management structures, ii) employee relations, iii) remuneration of staff and iv) tax compliance, are taken into account in the negative screening, whereby the sub-fund excludes issuers that violate the exclusion policies. In addition to excluding issuers involved in certain activities, this screening also ensures that issuers who seriously violate fundamental principles of environmental protection, social responsibility and good governance are excluded through the assessment of controversies and by evaluating companies based in countries that encourage unfair tax practices.

Private issuers are assigned an ESG risk score. The indicators used in this assessment vary depending on the company's subsector, but good governance is always taken into account. Companies with an ESG risk score higher than 40, based on data from the data provider Sustainalytics, are excluded, as well as companies that strongly conflict with one of the first 15 UN Sustainable Development Goals (a score of -10, based on the MSCI SDG Net Alignment Score). Ad-hoc exclusions or deviations can be applied to certain companies on the advice of the Responsible Investing Advisory Board.

More information on the negative screening can be found in the section 'How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?'.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in soecific assets.

The sub-fund may invest in securities, money market instruments, units in undertakings for collective investment, deposits, financial derivatives, liquid assets and all other instruments insofar as permitted by the applicable laws and regulations and consistent with the object as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Within these categories of eligible assets, the sub-fund fund aims to invest at least 51% of the assets in assets that promote environmental or social characteristics.

In addition, the sub-fund invests in technical investments, such as cash and derivatives, and assets in which the sub-fund temporarily invests following a scheduled update of the eligible universe that determines which assets promote environmental and/or social characteristics, for which there are no environmental or social safeguards. The sub-fund may hold or invest in these types of assets to achieve its investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Derivatives are used to hedge risks as specified in title 'Permitted derivative transactions' as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".

Investments in derivatives are not used to promote environmental or social characteristics and also will not affect them.

In addition, the sub-fund commits to invest at least 30% of the assets in 'sustainable investments'

Good governance practices include sound management structures, employee relations, remuneration of

staff and tax compliance.

as defined by art. 2.17 SFDR. The sub-fund does not distinguish between sustainable investments with an environmental objective and sustainable investments with a social objective. The objective with respect to sustainable investments for this sub-fund is equal to the sum of investments that are considered "sustainable" based on the published methodology on contributing to the achievement of the UN Sustainable Development Goals, plus investments in bonds that can be considered as bonds to finance green and/or social projects, plus instruments that are classified as "sustainable" by the Responsible Investing Advisory Board. More information can also be found in the section 'What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?.

Taxonomy-aligned activities are expressed as a share of:

#### -turnover reflecting the share of revenue from green activities of investee companies.

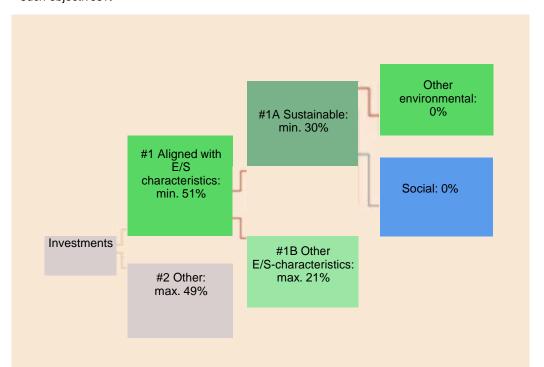
### -capital expenditure

(CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

### -operational expenditure

(OpEx) reflecting green operational activities of investee

companies.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product;

**#2** Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category #1 Aligned with E/S characteristics covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S-characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

# How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Investments in derivatives are not used to attain the environmental or social characteristics promoted by the sub-fund and will not affect them.

Derivatives are used to hedge risks as specified in the permitted derivatives transactions as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund".



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

The sub-fund does not specifically seek to invest in environmentally sustainable economic activities within the meaning of the EU Taxonomy.

The percentage of government bonds in the portfolio as defined in the chart under "Does the financial product invest in EU taxonomy compliant fossil gas and/or nuclear energy activities?" varies over the life of the sub-fund and no minimum threshold is set.

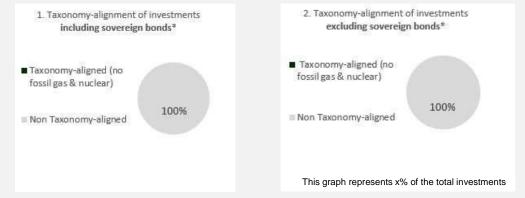
Consequently, the visual representation of the portfolio composition in '1. Taxonomy-alignment of investments including sovereign bonds' does not differ from the visual representation of portfolio composition in '2. Taxonomy-alignment of investments excluding sovereign bonds'. The percentage invested at all times in environmentally sustainable activities within the meaning of the EU taxonomy is 0%.

Whether or not to invest in government bonds has no impact on this percentage.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy Yes in fossil gas in nuclear energy No (1) Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they

contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

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



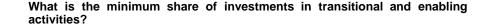
For the purpose of these graphs, 'sovereign bonds' consists of all sovereign exposures.

activities directly enable other activities to make a substantial contribution to an environmental

**Enabling** 

objective.

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



Not applicable.

0



are

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

The sub-fund commits to invest at least 30% in sustainable investments as defined by art. 2.17 SFDR. No distinction is made between environmentally sustainable investments and socially

sustainable investments. The sub-fund does not commit to invest a minimum share thereof in instruments with an environmental objective that are not aligned with the EU Taxonomy. Therefore, the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is thus 0%.

Asset managers depend on available sustainability data relating to their investee companies. Although the EU is currently preparing a Directive that would require companies to publish sustainability information (the Corporate Sustainability Reporting Directive), this legislation is still a work in progress. Consequently, there is currently a lack of sustainability data available. This has created the risk that investment funds currently report a very low percentage of investments that



sustainable

investments with an environmental objective that do not take into account the criteria environmentally sustainable economic activities the under FU-

Taxonomy.

comply with the EU Taxonomy.



What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 0%.



What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

There are technical investments such as cash and derivatives that are not part of the screening methodology. The sub-fund may hold or invest in these types of assets to achieve investment objectives, to diversify the portfolio, for liquidity management purposes and to hedge risks. Investments in derivatives are not used to promote environmental or social characteristics and will not affect them. Derivatives are used to hedge risks as specified in the title "Permitted Derivative Transactions" as described in the prospectus under the title "Information concerning the sub-fund UBB ExpertEase Highly Dynamic Tolerant Responsible Investing", section "Investment policy of the Master Sub-Fund". For the investments under "#2 Other" there are no environmental or social minimum safeguards.



Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

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

No reference benchmark has been designated for the purpose of attaining the environmental or social characteristics promoted by this sub-fund.

For investments in instruments issued by governments, supranational debtors and/or government-linked agencies, the described reference portfolio of global government bonds (composed of the following benchmarks: 67% developed markets: J.P. Morgan GBI Global Unhedged EUR and 33% emerging markets: J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR) is used as a basis for comparison, to compare certain ESG characteristics promoted by the subfund.

How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.



Where can I find more product specific information online?

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

https://www.ubbam.bg/en/expertease/UBB-expertease-SRI-high-dyn-tol/documents