



**INFORMATION OF THE COMPANY IN CONNECTION WITH THE PROVISION OF
INVESTMENT SERVICES**

Generali Investments CEE, investiční společnost, a.s.
Na Pankráci 1720/123, 140 00 Praha 4, Czech Republic
Company ID No.: 43873766



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1 Introduction

Information of the Company in Connection with the Provision of Investment Services of the Company Generali Investments CEE, investiční společnost, a.s. (hereinafter the "**Information of the Company**") has been prepared in compliance with the law of the Czech Republic and with the EU legislation as of the **10th March 2021**. The Information of the Company is available on request in the registered office of the company or at its website <http://www.generali-investments.cz>.

Generali Investments CEE, investiční společnost, a.s. reserves the right to change or amend the Information of the Company at any time without prior notice.

The Client will be informed in advance on any important changes.

The terms with initial letters written in capital letters, mentioned in this document, have, for the purpose of this document, the meaning defined in the Business Terms and Conditions Regulating the Provision of the Investment Services of Client Asset Management and Investment Advisory Generali Investments CEE, investiční společnost, a.s. if not further stipulated otherwise.

2 Summary of Terms and Abbreviations

Company – Generali Investments CEE, investiční společnost, a.s., with its registered office in Praha 4, Na Pankráci 1720/123, Post Code 140 00, Czech Republic, Company ID No.: 43873766, entered into the Commercial Register maintained by the Municipal Court in Prague, file number B 1031

ACBCM - Act No. 256/2004 Coll., on Conducting Business on the Capital Market, as amended

AICIF - Act No. 240/2013 Coll., on Investment Companies and Investment Funds, as amended

Client – natural or legal person in contractual relationship with the Company regulating the provision of investment services consisting in the management of the client's assets, receiving and transmitting orders relating to investments instruments and/or investment advisory in terms of Section 11 (1)(c),(e) and (f) of AICIF irrespective of the Client's categorisation

Business Terms and Conditions – Business Terms and Conditions Regulating the Provision of the Investment Services of Client Asset Management and Investment Advisory Generali Investments CEE, investiční společnost, a.s.

3 General Information on the Company and Authorizations for the Provision of Services

The Company is an investment company in terms of the AICIF and, within the scope of the licence granted by the Czech National Bank decision, is entitled to:

- a) exceed a threshold;
- b) manage:
 - o standard UCITS funds (hereinafter the "UCITS"),
 - o foreign investment funds comparable to UCITS,
 - o alternative investment funds (hereinafter the "AIFs"),
 - o foreign investment funds comparable to AIFs,
 - o qualified investors funds with exception of the qualifying venture capital funds according to the Article 3(b) of the directly applicable EU law regulating qualifying venture capital funds and European social entrepreneurship funds according to the Article 3(b) of the directly applicable EU law regulating European social entrepreneurship funds,



- foreign investment funds comparable to funds of the qualified investors with exception of the foreign investment funds comparable to the qualifying venture capital fund according to the Article 3(b) of the directly applicable EU law regulating qualifying venture capital funds and foreign investment funds comparable to the European social entrepreneurship funds according to the Article 3 letter b) of the directly applicable EU law regulating European social entrepreneurship funds,
- administer investment funds and foreign investment funds listed under subclause (b).

The Company is also licensed to manage client assets provided that the assets include an investment instrument, based on discretion within a contractual arrangement (portfolio management) under Section 11(1)(c) of the AICIF, to provide for safe-keeping and administration of securities (investment instruments), including related services, but only in relation to securities and registered securities issued by investment fund or foreign investment fund under Section 11(1)(d) of the AICIF, receive and transmit orders relating to investments instruments under Section 11(1)(e) of the AICIF and the Company may also provide investment advice in relation to investment instruments under Section 11(1)(f) of the AICIF.

Language in which it is Possible to Communicate with the Company

Czech, English

Means of Communication

Personally, by fax, by phone, by registered mail or by mail delivered by a messenger.

Article 5 of the Business Terms and Conditions contains a detailed description of the means of communication with the Company available to the Client.

Supervisory Authority

The Company is subject to the Czech National Bank supervision in terms of Act No. 15/1998 Coll., on Supervision in the Capital Market Area and on Amending and Supplementing Other Acts, as amended.

Contact information:

Postal address

Česká národní banka
Na Příkopě 28
115 03 Praha 1

CNB mailroom address

Česká národní banka
Senovážná 3
115 03 Praha 1

Other:

tel.: +420 224 411 111
fax: +420 224 412 404
podatelna@cnb.cz
www.cnb.cz

4 Information on Personal Data Processing

Detailed information on personal data processing is listed in the document “**Information on personal data processing**” which is available on the website of the Company www.generali-investments.cz.

5 Information on Provided Services

The Company provides information to the Client on provided services in accordance with Business Terms and Conditions and, Investment Management Agreement, in particular about all operations with finances or investment instruments of the Client, basic information about execution of the order, information confirming execution of the order on durable medium in accordance with generally binding legal regulation, information about current state and market value of the Portfolio, information about the structure of the Portfolio and its profitability, list of



all operations performed on Portfolio, summary of performance development of Portfolios with relevant benchmark portfolios, target strategy of the Company during management of Client's Portfolio and total sum of portfolio management fee, and/or advisory agreement. The Company shall provide the Client with information on provided services which he is entitled to obtain in accordance with generally binding regulation. The Company provides the Client with advisory agreement with information also in document Information on provision of Investment Advisory.

6 Information on Investment Instruments

The Company provides investment services related to the following investment instruments defined in Section 3 of the ACBCM:

- a) transferable securities including in particular, without limitation:
 - 1. shares or similar securities representing an equity holding in a corporation or another legal person,
 - 2. bonds or similar securities tied with the right for repayment of a certain due amount,
 - 3. depositary receipts representing the ownership of securities specified in sub-paragraphs 1. and 2.
 - 4. securities which serve as substitutes for the securities specified in sub-paragraphs 1. and 2.
 - 5. securities which entitle their holder to acquire or transfer investment securities specified in sub-paragraphs 1. and 2.
 - 6. securities which entail the right for settlement in cash and the value of which is determined by the value of investment securities, foreign exchange rates, interest rates or interest yields, commodities or financial indexes or other quantitative indexes.
- b) collective investment securities, which are securities representing a share in investment funds or foreign investment funds,
- c) money-market instruments, in particular treasury bills, certificates of deposit and commercial papers,
- d) options, futures, swaps, forwards and other instruments the value of which is tied to the rate or value of securities, to foreign exchange rates, interest rates or interest yields, green house emission allowances, as well as other derivatives, financial indexes or financial quantitative indicators, and which entail the right for the settlement in cash or the right to receive the asset to which their value is tied,
- e) instruments for the transfer of credit risk,
- f) financial contracts for difference,
- g) options, futures, swaps, forwards and other instruments the value of which is tied to commodities and which entail the right for settlement in cash or the right, benefiting at least one the parties, to choose settlement in cash unless it is a settlement in cash due to the failure of a party of the derivative or another reason for premature termination of the derivative,
- h) options, futures, swaps, forwards and other instruments the value of which is tied to commodities and which entail the right to delivery of such commodities, and which are



traded on a European regulated market or in a multilateral trading facility or an organised trading facility, with the exception of wholesale energy products, as defined in Article 2(4) of Regulation (EU) No 1227/2011 on wholesale energy market integrity and transparency, traded on organised trading facilities that entail the right to delivery of such commodity,

i) options, futures, swaps, forwards and other instruments the value of which is tied to commodities and which entail the right to delivery of the commodity, which are not stated in letter h, not intended for business purposes and having features of other derivative investment instruments,

j) options, futures, swaps, forwards and other instruments the value of which is tied to climatic indicators, transport tariffs or inflation rates and other economic indicators published in the field of official statistics, and which result in the right to cash settlement or the right of at least one party to opt, whether it wishes to settle in cash unless it is a settlement in cash due to the failure of one of the parties to the derivative or for another reason of premature termination of the derivative,

k) instruments whose value is tied to things, rights, debts, indexes or quantitative indicators not referred to in letters (a) to (j) and which have the characteristics of other derivative financial instruments, in particular those traded on a European regulated market or in a multilateral trading facility or in an organised trading facility,

l) greenhouse gas emission allowances.

Investment in investment instruments entails a number of general and specific risks. The return and eventual profit from every investment are influenced by risks related to said investment. Investment offering a potentially higher profit commonly bears higher risks. The yields of the individual Investment Instruments generated in the preceding period do not guarantee yields generated by the same Investment Instrument in the future. Every Client is obliged to get acquainted with the risks of the investment or another transaction, as the case may be, contemplated by him or her to the greatest possible extent, and should the Client have any doubts or questions, he or she is obliged to get acquainted with the individual risks related to investments in Investment Instruments in greater detail or to request more necessary information from the Company. Qualified employees of the Company authorized to provide investment services are obliged to supply the Client, on request, with information about the characteristics of the individual investment instruments and about the risks related to investment in said investment instruments.

The Company provides the Client with information on whether the investment instrument relating to investment service, is intended for retail clients or for professional clients, always regarding a transaction with a particular investment instrument, which is related to the investment service before such investment service is provided.

7 Client Assets Protection

Unless the asset management contract stipulates otherwise, the Client's investment instruments are for the purposes of management of the Client's assets entrusted to the Company for management and the investment instruments obtained by the Company on the basis of management of the Client's assets are recorded on the securities account set up in the Client's name or in the name of the Company with a domestic bank or a bank with its



registered office in the European Union which has a licence for safekeeping of investment instruments¹; at the same time, the Company is entitled to make dispositions with the investment instruments only within the limits stipulated by the asset management contract. The Company is not allowed to use the Client's investment instruments for dealing in own account or for the account of a third party. This rule shall not apply if the Client grants his or her prior written consent to the Company.

Unless the asset management contract stipulates otherwise, the Client's funds (including the funds entrusted by the Client to the Company and the funds generated by management of the Client's assets) are for the purposes of management of the Client's portfolio recorded on the money account maintained in the Client's name or in the name of the Company with a domestic bank or a bank with its registered office in the European Union; at the same time, the Company is entitled to make dispositions with the funds on said account only within the limits stipulated by the asset management contract.

For the purpose of protection of the clients' assets, the Company observes, in compliance with the ACBCM, the measures preventing misappropriation of the funds and investment instruments held in trust, including, but not limited to, the rules relating to the management of the Client's funds and investment instruments and the accounting rules, the rules regulating the keeping of the respective registers, the rules regulating the supply of information to the Client on the fluctuation and the balances on the accounts where the funds and the individual investment instruments are kept, the rules determining the personnel authorized to sign documents on the basis of which the investment instruments entrusted to the Company are transferred, and the rules regulating supervision over the handling of said means and appointed the employee responsible for controlling compliance of the Company in area of clients assets protection.

In compliance with the provisions of the ACBCM, the Investor Compensation Fund secures the guarantee system out of which compensations are paid to the clients of Companies that are not able to meet their liabilities due to their clients. The Business Terms and Conditions contain a detailed description of the claim for compensation to be paid out from the Investor Compensation Fund.

8 Principles of Managing Conflicts of Interests

The Company has set up and maintains a managing and controlling system for an effective management of conflicts of interests which may occur in the performance of its activities, including the identification, prevention and reporting of any conflicts of interests to Clients. The Company maintains and regularly updates records of any conflicts of interests which occurred or might have occurred in connection with the provided investment service.

In providing its services, the Company acts honestly, fairly, professionally and in compliance with the best interests of its Clients. The Clients' interest is always preferred to the interest of the Company or the Company's employees. In order to protect the Clients' funds from any potential harm, the Company has prepared and maintains procedures to identify and manage conflicts of interests which may occur during the provision of services, especially between:

- a) The Company, its officers (managers, head employees), employees and Clients or potential Clients, between the Clients or potential Clients themselves,

¹ Section 4 (3)(a) of the ACBCM a) safekeeping and administration of investment instruments including related services,

- b) The person who controls the Company, or the person controlled by the same person as the Company, and their officers (head employees, managers) and the Clients or potential Clients,
- c) The Clients or potential Clients themselves.

When identifying and assessing conflicts of interests in connection with its activities, the Company has regard to whether the persons listed in the preceding paragraph, inter alia:

- a) May gain any financial benefit or avoid any financial loss to the detriment of the Clients,
- b) Have any interest in the outcome of the service provided to the Clients or in the outcome of the transaction executed in the name of the Clients which would be different from the interests of these Clients,
- c) Are motivated to give precedence to the interest of the Client over the interests of other Clients.

The Company implements the following measures in order to reduce the risk of conflicts of interests and eliminate any adverse influence on the Clients' interests:

- a) Organisational arrangement of the Company and physical separation of the individual workplaces, in compliance with the requirement of minimising undesirable information flows ("Chinese walls"/confidential zones/prohibition of accumulating selected activities),
- b) Measures concerning donations and invitations,
- c) Structure of the remuneration paid to employees and third parties which complies with the requirement that these persons have no interest in the escalation of any conflicts of interests and which mitigates any conflicts of interests,
- d) Monitoring of any potential and existing conflicts of interests, and
- e) Restricted implementation of selected activities relating to any identified conflicts of interests.

The procedures for managing conflicts of interests according to the attending circumstances and the particular situation primarily include the following measures:

- a) Implementation of "Chinese walls" (i.e. physical and electronic barriers) and regulation of the procedures whereby these barriers are overcome in order to prevent any undesirable exchange of information between the relevant persons who engage in activities with a potential to generate a conflict of interests,
- b) Observance of the strict prohibition of giving precedence to dealing for own account under terms which would be identical to or better than the terms provided to the Clients,
- c) Structure of the remuneration paid to employees and third parties acting on behalf of the Company which prevents conflicts of interests between the implemented activities or conflicts of interests in generating values for the benefit of the Company,
- d) Introduction of an independent supervision and reporting lines for relevant employees who engage in activities that involve a risk of a potential conflict of interests,
- e) Application of the four-eye principle, i.e. a principle that certain procedures may only be implemented with the participation of no fewer than two employees,
- f) Implementation of measures with the objective of preventing or duly supervising a parallel or consequent involvement of relevant employees in the provision of services or performance of activities where such involvement could adversely affect the conflict of interests management,
- g) Training and education for employees and third parties acting on behalf of the Company,
- h) Observance of the compliance rules by employees involved in the handling of inside information,
- i) Transparent fulfilment of the reporting duties to the Clients.



If an adverse effect on the Client's interests resulting from a conflict of interests cannot be reliably prevented despite the adopted measures, the Company shall inform the Client of the nature or source of the conflict of interests before the investment services are provided. The Company may refuse the provision of the requested investment service, either in whole or in part, if a conflict of interests is imminent between the Company and the Client or between two or more Clients themselves.

9 Remuneration System

In compliance with the obligations stipulated by the law and those arising from the applicable Generali Group policies, the Company has established and applies a system of remuneration of its employees, incl. senior employees. The strengthening of the link between the remuneration system for key personnel and the principle of sustainability and long-term results forms a part of the Generali Group's long-term objectives.

The remuneration system is based on the principle that the total remuneration consists of a fixed non-discretionary bonus (salary) and a variable discretionary bonus (short-term and long-term bonus). The discretionary bonus is paid if the predefined conditions are met which usually depend on the Company's profit or loss, the performance of the Generali Financial Group and the long-term and the sustainability of the results achieved and the philosophy of lifelong partnership with its Clients and especially the assessment of the employee's performance.

In addition, the Company applies specific remuneration principles and procedures in relation to employees who have a significant influence on risks to which the Company or the Client may be exposed.

The remuneration system has been prepared in such a manner as to support proper and effective risk management, and discourage the running of risks exceeding the risk profile of the Company and Clients. The principles of the remuneration system are in line with the Company's strategy, defined objectives, values and long-term interests, and include procedures to prevent conflicts of interests and to support the longevity and sustainability of the activities performed by the individual employees and the whole Company. This description of the remuneration system is publicly available at the Company's website and details of the current remuneration system may be provided to the investor on request, free of charge, in documentary form.

Fixed Non-Discretionary Remuneration – Salary

The employee is entitled to his or her salary for the work done. The amount of salary depends on the employee's job status/office, his or her specific work tasks and the related degree of competences and liability.

Variable Discretionary Remuneration – Bonus

Decisions on the amount of the discretionary financial benefits (bonuses) paid to the individual employees are made by the Board of Directors of the Company. Employees are evaluated based on the achievement of their objectives – KPIs (Key Performance Indicators) which are set for the employees in advance. KPIs are based on a combination of financial and firmly measurable criteria and non-financial criteria. The focus on sustainability, including possible impacts on the environment, the wider society and a sustainable management system, plays an important role in the non-financial criteria. The calculation of the employee's variable discretionary remuneration is based on the percentage performance of the individual partial KPIs criteria, the Company's profit and loss and the profit of the Generali Financial Group and also on the evaluation of the approach to and emphasis on the attitude towards fulfillment of the aforementioned principles of longevity and sustainability of the Company's operations.

Rules for the Remuneration of Selected Individuals

Employees who, in the performance of activities within the framework of their job status/ office, have a significant influence on the risks to which the Company may be exposed, are included in the Risk Takers category. The Risk Takers category of employee group consists of:

- a) Members of the Board of Directors and Supervisory Board,
- b) Senior portfolio managers and Head of Execution Desk.

This category of employees is also subject to the above rules on the determination of the fixed non-discretionary and variable discretionary remuneration where the salary and the bonus must be appropriately balanced. The appropriate salary-bonus ratio is determined individually.

The rules for the remuneration of the above individuals are also subject to specific measures. The Company applies a combination of short-term (annual) discretionary benefits (bonuses) and long-term (3-year) discretionary benefits (bonuses) for those with significant influence on the risks to which the Company may be exposed. For long-term performance (bonuses), the Company sets different objectives and the main focus is on the sustainability and stability of the results achieved. A significant part of short-term and long-term remuneration of persons having a significant influence on the Company's risks depends on the assessment of possible effects and impacts of the activities on the environment, wider society or the sustainable management system and also on the compliance with the Company's and Generali Group's internal policies in the area of investment processes, responsible and sustainable investing, etc.

To support the sustainability of the Company's operations, any bonus already awarded but not paid out may be withdrawn or the Company may claim back any bonus already paid. Risk Takers are prohibited from using any means (investment strategies) that would be targeted at hedging risks from a potential non-payment of the withheld bonus or any part thereof.

The aforementioned rules regulating the postponement of a part of the discretionary remuneration through long-term remuneration also apply to senior employees in divisions with control functions – Compliance, Risk Management, Internal Audit.

The Company applies the principle of proportionality in relation to the system of remunerating Risk Takers, considering its size and the importance, nature, scope and complexity of the activities, the Company has excluded the application of the remuneration rules of these individuals contained in the decree No. 163/2004 Coll, as amended.

In order to achieve independent control of the remuneration system, the Company has set up a remuneration committee consisting of shareholder representatives (Chief Investment Officer and Head of Regional HR & Organization of Generali CEE Holding, B.V.) and a representative of the Company's Supervisory Board.