

INFORMATION ON THE COMPANY PROVIDED IN CONNECTION WITH MANAGEMENT AND ADMINISTRATION OF INVESTMENT FUNDS

Generali Investments CEE, investiční společnost, a.s.

Na Pankráci 1720/123, 140 21 Prague 4 Company ID: 43873766

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1 Preliminary Provisions

Information on Generali Investments CEE, investiční společnost, a.s. has been prepared in compliance with the laws and regulations of the Czech Republic and the EU laws, and updated as at 6 November 2017. This Information is available on request in the registered office of the Company or at the Company's website at http://www.generali-investments.cz.

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

The Client will be notified of any significant amendments in advance.

Capitalised terms used in this document shall have the meaning defined in the "Terms and Conditions of Generali Investments CEE, investiční společnost, a. s., for Investments in Funds and Investment Programs", unless stipulated otherwise below.

2 Overview of Used Terms and Abbreviations

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

Client - holder of the securities issued by the Fund

CNB – Czech National Bank, with its registered office at Na Příkopě 28, 115 03 Prague 1

Company – Generali Investments CEE, investiční společnost a.s., Company ID No.: 43873766, with its registered office at Na Pankráci 1720/123, 140 21 Prague 4, registered in the Commercial Register maintained by the Municipal Court in Prague, Section B, File No. 1031

Decree – Decree No. 244/2013, on More Detailed Regulation of Some Rules Provided in the Act on Investment Companies and Investment Funds, as amended

Fund – the collective investment fund, foreign fund (sub-fund) comparable with standard funds and / or funds of qualified investors managed by the Company

NCC - Act No. 89/2012, Civil Code, as amended

3 Basic Information on the Company and its Licence to Provide Services

The Company is an investment (management) company in terms of the AICIF and, within the scope of the license granted under the Czech National Bank decision, is entitled to:

- a) Exceed a specified limit (threshold);
- b) Manage:
 - standard funds,
 - o foreign investment funds comparable with standard funds,
 - o special funds,
 - o foreign investment funds comparable with special funds,
 - funds of qualified investors, except for (i) qualifying venture capital funds (EuVECA) under Article 3(b) of the directly applicable EU law regulating European venture capital funds and (ii) qualifying social entrepreneurship funds (EuSEF) under Article 3(b) of the directly applicable EU law regulating European social entrepreneurship funds

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- o foreign investment funds comparable with funds of qualified investors except for (i) foreign investment funds comparable with qualifying venture capital funds (EuVECA) pursuant to Article 3(b) of the directly applicable EU law regulating European venture capital funds and (ii) foreign investment funds comparable with qualifying social entrepreneurship funds (EuSEF) pursuant to Article 3(b) of the directly applicable EU law regulating European social entrepreneurship funds;
- administer, within the scope of Section 38(1) of the AICIF, investment funds and foreign investment funds listed under subsection (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, provide for safe-keeping and administration of 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), and the Company may also provide investment advice in relation to investment instruments under Section 11(1)(f) of the AICIF.

Supervisory Body

The Company is subject to supervision exercised by the Czech National Bank in terms of Act No. 15/1998, on Capital Market Supervision and Amending and Supplementing Other Acts. Contact details:

Postal address	CNB mail room address	Other:
Česká národní banka	Česká národní banka	Tel.: 224 411
Na Džiliau ž 00	0	F 004 440

Na Příkopě 28 Senovážná 3 Fax.: 224 412 404

115 03 Prague 1 115 03 Prague 1 podatelna@cnb.cz

www.cnb.cz

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4 Complaint Procedures

Particulars of claims and complaints

A claim is a Client's response if the Client believes that the Company has failed to meet a contractual arrangement or acted contrary to the applicable laws and regulations. A complaint shall be any report describing staff conduct or other behaviour having impact on the Client, and also any expressed doubt or dissatisfaction submitted by the Client or any other third party.

Any claim or complaint submitted by the Client must contain:

- Full identification of the Client.
- The Client's correspondence address or, as applicable, the Client's telephone number or e-mail for inquiries concerning any details of the Client's claim or complaint,
- Accurate description of the event which is the subject matter of the claim or complaint, supported by any and all available documents and other significant information (such as excerpts, copies of orders and other information),
- o Date when the claim or complaint was filed.

The Company is entitled to request the Client to submit further documents relating to the claim or complaint. The Client is obliged to provide any assistance necessary during the proper review and resolution of the claim or complaint. An incomplete claim may be

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supplemented by the Client within 10 calendar days of receiving a request for additional information. If the Client fails to supplement the claim at the Company's request, the Company shall handle the claim, if possible, on the basis of the incomplete information, otherwise the Company shall dismiss the claim.

Method of filing a claim or complaint and Method how to inform clients on their settlement

The Client is entitled to file a claim or complaint using any of the following methods:

- sending a claim or complaint in a written from by mail to mailing address (contact address) or Generali Investments CEE, investiční společnost, a.s., P.O. BOX 405, 660 05 Brno
- o by e-mail to info@generali-investments.cz
- by phone each working day from 8 a.m. to 6 p.m. to 281 044 198
- in person or in writing to the registered office of the Company, at the address: Generali Investments CEE, investiční společnost, a.s., Na Pankráci 1720/123, 140 21 Prague (Praha) 4

Any verbal claim or complaint filed by the Client shall be registered by employees of the Company. The Client has the right to view the contents of the record. If a claim or complaint is filed by phone, the Company has the right to record the call.

The Company does not handle any anonymous claims or complaints; such claims or complaints are merely registered.

A claim or complaint shall be resolved within 30 days of receipt by the Company. The time limit for settling a claim shall be interrupted until a final decision has been given or a proceedings have been suspended, if legal proceedings or proceedings before the Financial Arbiter have been initiated in the same case; this being without prejudice to the Company's right to make decision regarding such a claim or complaint in any case.

The date of filing shall mean the date of delivery of the claim or complaint to the Company. In the case of claims or complaints submitted electronically and if the claim or complaint is delivered during the weekend or holiday, the date of filing shall be the next business day.

The period for correction or completion of a claim or complaint shall not be included into this period. Where it is not possible to settle any claim or complaint within this period, the Company shall notify the Client that the claim procedures are in progress, including the expected resolution date.

Settlement of a claim or complaint will be notified to the Client in writing using a method of communication specified exclusively by the Company, yet usually using the same means of communication as used for the claim or complaint delivered to the Company, unless any other form is individually agreed with the Client. The costs incurred in connection with the handling of claims or complaints filed by Clients shall be paid by the Company.

Other means of protection

Under Act No. 229/2002 on Financial Arbitrators as amended, the Client has the right to out-of-court settlement of consumer disputes, in the Office of Financial Arbitrator.

Kancelář finančního arbitra (Office of the Financial Arbitrator) Legerova 1581/69 110 00 Prague 1

Phone: +420 257 047 070 e-mail: arbitr@finarbitr.cz

www.finarbitr.cz

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Should the Client think that the Company has breached its obligations stipulated in legal regulations amending the Company business, the Client is entitled to file a complaint or initiative with the Czech National Bank (Česká národní banka).

Česká národní banka

Na Příkopě 28 115 03 Prague 1

Phone: +420 224 411 111 e-mail: podatelna@cnb.cz

www.cnb.cz

This does not affect Client's right to apply to the court.

5 Personal Data Processing

The Company, as the administrator of personal data, processes the Clients' personal data or, as applicable, the processing of the Clients' personal data can be outsourced to the Company's hired processors, subject to compliance with requirements stipulated by Act No. 101/2000, on Personal Data Protection and Amending Selected Legislation, as amended. Personal data is processed both automatically and manually

Mandatory Processing in order to Comply with Legal Obligations of Data Administrator

The Company, as the administrator of personal data, is under the obligation imposed by special laws and regulations to process the Clients' personal data. This primarily involves personal data the processing of which is mandatory for the purpose of identifying the Client under Act No. 253/2004, on Selected Measures against the Legalisation of Proceeds from Crime, to an extent which is always stipulated for a given purpose. It also involves personal data processed pursuant to Act No. 256/2004, on Capital Markets Undertakings, as amended, and pursuant to the applicable implementing legislation, primarily Decree No. 58/2006, on the Method of Keeping Separate Records of Investment Instruments and Records Based on Separate Records of Investment Instruments, as amended, Act No. 240/2013, on Investment Companies and Investment Funds, as amended, and other special legal regulations

All the above cases include processing which is necessary to assure compliance with the administrator's legal obligations and processing which is necessary to assure proper performance of the contract entered into with the Client as the data subject. In such cases, the personal data processing does not require the Client's consent.

Processing of Personal Data with Client's Consent

The Company may process Client's personal data to any other purpose than stated above only with the Client's consent.

The Client grants his/her consent by signing the Contract on terms and conditions of issue and redemption of Securities for the purpose of offering the trade, services and products of companies from the Generali Group and selected business partners with whom the Company and the companies from the Generali Group cooperate, and for the purpose of a marketing processing, adjusting our offer and enhancing the services provided by the Generali Group.

The Client grants his/her consent to the Company and, through the Company, also to the companies from the Generali Group. Personal data shall be processed primarily by the companies from the Generali Group and cooperating business partners.

The Company considers the Client's personal data confidential and is obliged to maintain confidentiality with respect to such personal data.

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Consequences of Act No. 101/2000, on Personal data Protection and on Amendments to Certain Laws, as amended

The Client is authorised to request the Company to provide him / her with the information related to processing of his / her personal data.

If the Client believes that his or her personal data is being processed in breach of the law or in violation of privacy, the Client may ask the Company for an explanation or can request a remedy, as applicable. If the Client's request is justified, the Company shall remedy the situation without delay.

If the Client's request is rejected, the Client may petition the Office for Personal Data Protection.

The Company shall process only specified personal data collected in compliance with the law and is obliged to update the processed personal data. To that end, the Clients whose personal data is being processed are obliged to immediately report any change thereto.

6 Information for Investors in Special Funds and Funds of Qualified Investors Managed by the Company

The Company shall disclose to the investors the information pursuant to Section 241 of the AICIF in the Statute of any respective Fund before an investment is made. Provision of information pursuant to Section 241(1)(d), (m), (r), (s) and (u) of the AICIF and pursuant to Section 241(4) of the AICIF does not apply; otherwise it will be specified in this document and/or directly in the Statute or in the annual report, as the case may be. The above information shall be disclosed to investors in funds of qualified investors pursuant to Section 293(1) of the AICIF in a similar manner.

7 Principles for Managing Conflicts of Interest

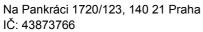
When rendering services, the Company acts in an honest, fair and equitable manner, professionally and in compliance with the best interests of its Clients. The Clients' interest will always be preferred to the interest of the Company or the Company's employees. In order to protect the Clients' funds from any potential harm, the Company has prepared and maintains procedures to identify and manage conflicts of interests which might occur when rendering services, in particular between:

- a) the Company, the Company's head employees (managers), employees and Funds, between the individual Funds and the Clients:
- b) a person who controls the Company, or a person controlled by the same person as the Company, and their head employees (managers) and Funds and the Clients;
- c) individual Clients.

When investigating and assessing the conflicts of interests in connection with its activities, the Company shall take into account whether the persons listed in the preceding paragraph:

- a) may gain any financial benefit or avoid any financial loss to the detriment of the Funds;
- have any interest in the outcome of services provided to the Funds or in the outcome
 of trades implemented in the name of the Funds, which is different from the interest of
 these Funds;
- c) are motivated to give precedence to the interest of one particular Fund over the interests of other Funds;
- d) engage in a business similar to the Fund's business;

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e) repeatedly obtain or will obtain from a person/entity other than the Fund an Incentive in connection with the services rendered to the Funds, and the Incentive does not represent a regular consideration for the provided service.

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

- a) organisational arrangement of the Company and physical separation of individual workplaces, in compliance with the requirement to minimise any 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 conflicts of interests;
- d) structure of the fees and other Incentives provided to the distributors of Fund units which complies with market standards and the applicable laws and regulations;
- e) monitoring any potential or existing conflicts of interests;
- limited implementation of selected activities relating to any identified conflicts of

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

- a) implementation of "Chinese walls" (i.e. physical and electronic barriers) and regulation of procedures preventing to overcome such barriers in order to prevent any undesirable exchange of information between relevant persons who engage in activities with a potential to generate a conflict of interests;
- b) strict prohibition of giving precedence to dealing on own account under terms identical to or better than the terms provided to the Funds:
- 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 in generating values for the benefit of the Company;
- d) implementation of independent supervision and reporting lines for relevant employees who engage in activities involving the risk of a potential conflict of interests:
- e) application of the four-eyes principle, i.e. a principle that defined procedures may only be implemented with the participation of no fewer than two employees at the same
- 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) provision of 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;
- transparency of reporting duties (disclosure of information) towards Clients, including the announcement of any potential conflicts of interests.

Information on Incentives

Incentive shall mean any fee, remuneration or non-financial benefit accepted, offered or provided upon rendering investment services between the Company and the Client or between the Company and a third party. If any third party is a member of the same financial group, the incentive is assessed according to the same criteria

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When rendering services, the Company and the Company's employees are prohibited from accepting, offering or providing any incentive which can result in any breach of the duty to act with expertise, in an honest, fair and equitable manner and in the best interest of the Clients.

An Incentive is acceptable if it is paid:

- a) by the Fund, on behalf of the Fund, or to the Fund;
- b) to a third party or for a third party or paid by a third party or on behalf of a third party and:
 - the Fund had been clearly, comprehensibly and fully informed of the existence and nature of the Incentive and the amount or value or the method of calculating the Incentive (if it cannot be determined in advance) prior to the performance of the relevant activity;
 - o the Incentive has the potential to improve the quality of relevant activities, and
 - the Incentive does not conflict with the Company's duty to act with expertise, in an honest, fair and equitable manner and in the best interest of the Client or the Fund.

Detailed information regarding the Incentive (primarily on the amount or value of the Incentive or, as applicable, the method for the determination thereof) is communicated to the Client on request.

9 Principles for Exercising Voting Rights

The concentration of investment instruments with voting rights held in the Funds' portfolios is continuously monitored. As soon as the concentration reaches the stipulated limit, the Company initiates a detailed monitoring of important events at the respective issuer and defines the strategy of exercising the voting rights on the basis of the acquired information.

Voting rights are exercised exclusively for the benefit of respective Funds. The Company makes sure that the exercise of the voting rights complies with investment objectives or investment policy of the Funds. The Company also makes sure that it duly prevents or manages any conflicts of interests which might arise from the exercise of the voting rights.

10 Rules for the Execution of Trades

The Company has prepared rules and has defined processes for the execution of trades in investment instruments as part of the implementation of the Fund's investment strategy. The rules for the execution of trades are primarily based on the following principles:

- The trade is executed with the objective to accomplish the best possible results for the Fund, i.e. we compare investment opportunities on available markets and with available counterparties;
- b) Decisions on the method of executing the trade are based on the assessment of the following main criteria:
 - o price for which the trade can be executed (incl. the overall volume of fees relating to the trade),
 - o speed and likelihood with which the trade can be executed,
 - terms, conditions and quality of settlement of the trade;
 - o other factors, primarily services rendered by the counterparty (such as investment research), etc.,
 - the above criteria are assigned their relative importance taking into regard specific factors, such as the characteristics of the Fund, trade, investment instrument and execution venues (settlement points),
- c) The following factors are honoured and observed:
 - o applicable internal procedures and decision-making authorisations,

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- duties arising from internal decisions, statutes of the Funds, laws and other relevant rules;
- o investment strategy of the Funds.

Each category of investment instruments is assigned a standard method of execution of the trade, while the primary objective is pursued, namely execution of the trade which would be most profitable for the Fund. Despite the fact that the most important criterion is usually the price and the costs of executing the trade, circumstances of specific market situations or extraordinary events may persuade the Company to depart from the standardised procedure in pursuit of the primary objective. The Company is in such cases fully entitled to determine which criteria are most important for the overall quality assessment of the execution of the trade

In executing the trades, the Company does not give precedence to the interests of one group of Clients over the interests of another group of Clients.

The Company continuously monitors and regularly evaluates the effectiveness of the rules for the execution of trades. The assessment focuses primarily on the effectiveness of the rules themselves for the execution of trades, their practical implementation and selection of the individual counterparties.

11 Information Provided in Connection with the Execution of a Distance Contract

If the execution of the Contract requires a notice under Section 1843 of the New Commercial Code, such notice is provided to the Investor as a text delivered by e-mail. If requested by the Investor, the Company provides the notice under Section 1843 of the New Commercial Code in paper form.

12 Remuneration System

In compliance with the obligations stipulated by the law and resulting from the applicable policies of the Generali Group, the Company has set up and employe a remuneration system for its employees, including head employees (managers).

The remuneration system is based on the principle that the total remuneration consists of a fixed mandatory component (salary) and a variable optional component (bonus). The optional component of the remuneration is paid out if certain pre-defined conditions are met which usually depend on the profit/loss of the Company, taking into account the profit/loss of the Generali Financial Group, and are especially based on the evaluation of the respective employee's performance.

The Company also applies specific remuneration principles and procedures in relation to employees who have a significant influence on risks to which the Company or the Fund may be exposed.

The remuneration system has been prepared in such manner as to support proper and effective risk management, and discourage risk-taking exceeding the risk profile of the Company and of the Funds. The remuneration system principles comply with the Company's strategy, the stipulated objectives, values and the Company's long-term interests, and include procedures established to prevent conflicts of interests. This description of the remuneration system is publicly accessible at the Company's website and details regarding the current remuneration system may be provided to the investor on request, free of charge, in paper form.

Fixed Mandatory Component of the Remuneration – Salary

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

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Variable Optional Component of the Remuneration - Bonus

Decisions on the amount of the optional financial remuneration (bonuses) paid to individual employees are made by the Board of Directors of the Company. Employees are evaluated according to 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 calculation of the variable optional component of the employee's remuneration is based on the performance (in percent) of the individual partial KPIs criteria, profit/loss of the Company and profit/loss of the Generali Financial Group.

Rules for the Remuneration of Selected Individuals

Employees who, in the performance of activities within the framework of their job status or 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 employees consists of:

- a) Members of the Board of Directors and of the Supervisory Board,
- b) Senior Portfolio Managers.

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

The rules for the remuneration of the above individuals are also subject to specific measures, namely postponement of the bonus payout in the following manner:

- 55% of the bonus (based on the assessment of the KPIs fulfilment) is paid out after the end of the respective reference period, i.e. the calendar year;
- 45% of the bonus is being paid in instalments over the following three years (based on the repeated assessment of fulfilment of the stipulated objectives for each relevant calendar year).

The Company may also withhold any bonus which has already been awarded but has not yet been paid out, and in a similar way to demand the return of any bonus which has already been paid out. Risk Takers are prohibited from using any means (investment strategies) which would be targeted at hedging risks from a potential non-payment of the withheld bonus or any part thereof.

The rules regulating the postponement of the bonus payout also apply to head employees in departments with control functions – Compliance, Risk Management, Internal Audit.

The Company applies the principle of proportionality in relation to the system of remunerating the Risk Takers; considering its size and the importance, nature, scope and complexity of the activities, the Company has determined that the rules contained in Clause 9 of Annex 1 to the Decree shall not apply to these individuals.

With respect to Company size and organisational structure as well as its nature, scope and complexity of performed activities, no remuneration committee consisting of members of a control body, i.e. Supervisory Board of the Company, has been established. In order to provide a competent and independent evaluation of principles and procedures as well as incentives to manage risk outside other Companies, a CEE Reward Committee has been established for the Region of Central Europe with Central-European CEO of Generali CEE Holding, Head of CEE HR & Organization and Head of Global HR Operations being members of this Committee.

13 List of Funds under Asset Management

As of the date of issuing this document, the Company manages the assets of the following investment funds:

Standard collective investment funds:

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- o Fond konzervativní, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond vyvážený dluhopisový fond, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond korporátních dluhopisů, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond balancovaný konzervativní, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond globálních značek, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- o Fond farmacie a biotechnologie, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond ropy a energetiky, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond nových ekonomik, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond nemovitostních akcií, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.

Special collective investment funds:

- o Fond zlatý, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond živé planety, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond fondů vyvážený, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond fondů dynamický, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- o 7. Zajištěný otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Dluhopisový zajištěný otevřený podílový fond Generali Investments CEE, investiční společnost, a.s. (in compliance with the statute of the fund, the liquidation of the fund takes place)
- 2. Dluhopisový zajištěný otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond cílovaného výnosu, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.

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Funds of qualified investors:

- o Generali Real Estate Fund CEE a.s., investiční fond
- 15. Zajištěný fond kvalifikovaných investorů, otevřený podílový fond Generali Investments CEE, investiční společnost, a.s.
- Fond kreditního výnosu, otevřený podílový fond kvalifikovaných investorů Generali Investments CEE, investiční společnost, a.s.
- Realitní fond, otevřený podílový fond kvalifikovaných investorů Generali Investments CEE, investiční společnost, a.s.

Foreign funds (sub-funds) comparable with standard funds (offered also in the Czech Republic):

- o Premium Conservative Fund, Generali Invest CEE plc
- o Corporate Bonds Fund, Generali Invest CEE plc
- o Emerging Europe Bond Fund, Generali Invest CEE plc
- o Premium Balanced Fund, Generali Invest CEE plc
- o Dynamic Balanced Fund, Generali Invest CEE plc
- o Global Equities Fund, Generali Invest CEE plc
- o Premium Dynamic Fund, Generali Invest CEE plc
- o Oil and Energy Industry Fund, Generali Invest CEE plc
- o New Economies Fund, Generali Invest CEE plc
- o Commodity Fund, Generali Invest CEE plc
- o Emerging Europe Fund, Generali Invest CEE plc