

Approved on: 05.10.2018.

Effective from: 02.01.2019.

# Inducement Policy for the Provision of Investment and Ancillary Services

## 1. Objective

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

# 2. Restrictions on payment and receiving Inducement

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



- 2.3. By receiving and paying Inducements, the Bank must make sure that such Inducements enhance the quality of the respective investment services to the client, and collect and store evidence thereof. Pursuant to that the Bank:
- 2.3.1. Keeps the list of all Inducements received from third parties for the provision of investment or ancillary services; and
- 2.3.2. Registers how the incentives received or paid by the Bank or those that the Bank intends to use enhance the quality of the respective investment services to the client and what actions were taken so as not to impair compliance with the Bank's duty act honestly, fairly and professionally in accordance with the best interests of its clients.
- 2.4. The Bank only can receive or pay Inducements if the Bank properly discloses information on such Inducements to the clients as provided in this Policy, excluding cases mentioned in Article 6.
- 2.5. If the Bank receives the fees, commission fees or any monetary reward that do not comply with the requirements specified above, the Bank transfers them to the respective clients immediately after such payments were received.
- 2.6. The Bank's unit providing respective services to the clients, in order to use or receive any Inducement provided by other person than the Bank, must evaluate whether such Inducement complies with the requirements provided in Section 2 of the Policy. For this purpose, the authorised Bank's unit must be contacted. Authorised unit upon evaluation of the available information decides whether such Inducement complies with the conditions provided in Section 2 of the Policy. Where necessary, the authorised Bank's unit employs other units of the Bank in order to conduct proper evaluation. If upon evaluation it appears that the benefit does not comply with the requirements provided in Section 2 of the Policy, the Bank must not accept and use such benefit. In addition any such non-monetary benefit shall be returned to the provider which must be requested to cease provision of such benefit in the future. In case of monetary benefits, requirements of 2.4 of this Policy shall additionally apply.

### 3. Limitations related to investment researches

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

## 4. Disclosing information on Inducement

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



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

# 5. Minor non-monetary benefits

- 5.1. Minor non-monetary benefits shall be reasonable and proportionate and of such a scale that they are unlikely to influence the Bank's behaviour in any way that is detrimental to the interests of the relevant client.
- 5.2. Minor non-monetary benefits can be:
- 5.2.1. Information or documentation relating to a financial instrument or an investment service. Such information or documents are generic in nature or personalised provided to reflect the circumstances of an individual client;
- 5.2.2. Written material from a third party that is commissioned and paid for by an corporate issuer or potential issuer to promote a new issuance by the company, or where the third party firm is contractually engaged and paid by the issuer to produce such material on an ongoing basis, provided that the relationship is clearly disclosed in the material and that the material is made available at the same time to any investment firms wishing to receive it or to the general public:
- 5.2.3. Participation in conferences, seminars and other training events on the benefits and features of a specific financial instrument or an investment service;
- 5.2.4. Hospitality of a reasonable de minimis value, such as food and drink during a business meeting or a conference, seminar or other training events, that are mentioned in paragraph 5.2.3.;
- 5.2.5. flowers, souvenirs, books or representation materials, if total price of all received benefits from one person doesn't exceed equivalent of one minimal salary;
- 5.2.6. services and different discounts, that are offered by commercial entities and that are publicly available.

## 6. Inducement related to portfolio management services

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



# Annex No. 1 to the Policy

### PRIOR NOTIFICATION ON INDUCEMENT

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

## INDUCEMENT RECEIVED

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

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

<sup>\*</sup>According to the agreement between Bank and Luminor Bank AS Lithuanian branch, the Bank receives 80% of the Luminor Bank AS Lithuanian branch fees that are mentioned above for Bank's Clients.

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

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

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



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



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



DJE - Zins & Dividende PA	LU0553164731	1,26%	40,0%
DNB fund - Asian Small Cap	LU0067059799	1,75%	40,0%
DNB fund - Global Emerging ESG	LU0090738252	1,75%	40,0%
DNB fund - ECO Absolute Return A EUR Cap	LU0547714286	1.50%	50,0%
DNB Fund - ECO Absolute Return A NOK Cap	LU0547714369	1.50%	50,0%
DNB fund - Global SRI ESG	LU0029375739	1,25%	40,0%
DNB fund - India	LU0302237721	1,50%	40,0%
DNB fund - Nordic Equities	LU0083425479	1,25%	40,0%
DNB fund - Private Equity - B	LU0302296065	1,75%	40,0%
DNB fund - Technology	LU0302296495	1,50%	40,0%
DNB fund - Technology (USD)	LU1047850349	1,50%	40,0%
DNB Fund - TMT Absolute Return A EUR Cap	LU0547714526	1.50%	50,0%
DNB Fund - TMT Absolute Return retail A (NOK)	LU0547714799	1.50%	50,0%
DWS Global Natural Resources Equity Typ O	DE0008474123	1,80%	40,0%
DWS Invest - GL Emerg - Anteile LC	LU0210301635	1,50%	40,0%
DWS Invest Chinese Equities Fund	LU0273157635	1,50%	40,0%
DWS MOPs LD	LU0989117667	1,40%	40,0%
Emerging: Emerging Markets Smaller Comp - Franklin Tem	LU0300743431	1,60%	40,0%
Europe: Euro-Markets - BlackRock	LU0162689763	1,50%	40,0%
Europe: Euro-Markets - BlackRock(A2)	LU0093502762	1,50%	40,0%
Europe: Europe Potential - Pioneer	LU0271656307	1,50%	40,0%
Europe: European Growth - Fidelity	LU0048578792	1,50%	40,0%
Europe: European Value Equ - MSI	LU0073234501	1,44%	40,0%
European High Yield Fund- Fidelity	LU0110060430	1,00%	40,0%
FIDELITY FUNDS-EMERGING Markets - SS (Sicav)	LU0048575426	1,50%	40,0%
FRANK TEMP INV LAT AMER-A- (Equity )	LU0128526570	1,60%	40,0%
FRANK TP LAT AMR-A	LU0260865158	1,60%	40,0%
Franklin Euro High Yield A Acc EUR	LU0131126574	1,20%	40,0%
Franklin European Small Cap Growth Fund	LU0260871552	1,60%	40,0%
Franklin Templeton Biotech Discovery fund A Acc	LU0109394709	1,60%	40,0%
Franklin Templeton European Growth Fund	LU0122612848	1,60%	40,0%
FRANKLIN TEMPLETON FUNDS - MENA Fund	LU0352132285	1,60%	40,0%
Franklin Templeton Inv.Fund - European Small-Mid Cap Growth Fund	LU0138075311	1,60%	40,0%
FTIF-F Japan Fund Namens-Ant (acc) EUR o.N.	LU0231790675	1,60%	40,0%
FTIF-F Japan Fund Names-Ant A (acc) USD o.N.	LU0231790832	1,60%	40,0%
GAM Multistock - Emerging Markets Equity EUR	LU1112791014	1,50%	40,0%
Invesco Pan European Equity A Acc	LU0028118809	1,50%	40,0%
Invesco Pan European High Income Fund	LU0243957312	1,25%	40,0%
Japonija: Japonijos akciju fondas, Metzler	IE0003722711	1,00%	40,0%
JPM Eastern Europe Equity	LU0210529144	1,50%	40,0%
JPM Europe Equity Plus A (perf) Acc EUR	LU0289089384	1,50%	40,0%
JPM-EUROPE ST.VAL.A D.EO	LU0107398884	1,50%	40,0%
JPMorgan Funds - Europe Small Cap Fund	LU0210531637	1,50%	40,0%



JPMorgan Funds - Global Focus Fund	LU0210534227	1,50%	40,0%
JPMorgan IF - Global Balanced Fund A (acc) - EUR	LU0070212591	1,45%	40,0%
JPMorgan JPN RUSSIA- A-DIS (SICAV)	LU0215049551	1,50%	40,0%
JPMorganF-JF CHINA - A-ACC (SICAV)	LU0210526637	1,50%	40,0%
JPMorganJPM Russia -ACC (Sicav)	LU0215050484	2,50%	40,0%
KAPITAL PLUS OPEN END FUND	DE0008476250	0,72%	40,0%
Latin: Latin America - Gartmore	LU0200080918	1,50%	40,0%
Liuksemburgo banko inv. fondas BL-BOND DOLLAR- B- CAP-	LU0093570926	0,60%	40,0%
Liuksemburgo banko inv. fondas SOU/BL-BOND EURO- B- CAP	LU0093570769	0,60%	40,0%
Liuksemburgo banko inv. fondas SOU/BL-EQUITIES AMERICA	LU0093570256	1,25%	40,0%
MFS Global Equity Fund	LU0094560744	1,50%	40,0%
MFS MERIDIAN European Value Fund	LU0125951151	1,50%	40,0%
Mirova Global Sustainable Equity Fund	LU0914729453	0,22%	40,0%
Natixis Har Assc Useqf-lausd	LU0130102931	0,38%	40,0%
Nordlux Pro-Aktiv-A	LU1046626096	1,00%	40,0%
Pictet Emerging Local Currency Debt Fund	LU0255798109	1,20%	40,0%
PIONEER FUNDS- EAST EU EQ - A	LU0119336021	1,50%	40,0%
Russia: Russia - DWS	LU0146864797	1,23%	40,0%
Schroder ISF European Smaller Companies A Acc Open.	LU0106237406	1,50%	40,0%
Sector: DNB Renewabl. Energy- DNB	LU0302296149	1,50%	40,0%
Sector: Global Health Care - Fidelity	LU0114720955	1,50%	40,0%
Sector: Global Technology - Fidelity	LU0099574567	1,50%	40,0%
Sector: World Commodities CHE Parvest	LU0823449425	1,50%	40,0%
Sector: World Gold - BlackRock (Hedged A2)	LU0326422689	1,75%	40,0%
SHRODER INT EURO CORP A1 D	LU0406854488	0,45%	40,0%
Templeton Asia Growth fund USD	LU0128522157	1,60%	40,0%
Templeton Asian Bond Fund A USD	LU0229949994	1,00%	40,0%
Templeton Emerging Markets bond fund A USD	LU0029876355	1,60%	40,0%
Templeton Euroland A (acc) EUR	LU0093666013	1,60%	40,0%
Templeton US Equity fund USD	LU0098860363	1,60%	40,0%
UBS (Lux) Equity SICAV-Emerging Markets High Dividend	LU1081987536	1,76%	40,0%
UBS (Lux) Equity - USA Multi St.DL Inhaber	LU0098995292	1,44%	40,0%
US: US Equity- Franklin Temp.	LU0139291818	1,60%	40,0%
US: US Growth - Morgan ST	LU0073232471	1,68%	40,0%
World: DWS Invest Top Dividend Fund	LU0507265923	1,50%	40,0%
World: World FD - Fidelity	LU0069449576	1,50%	40,0%
African Equity Fund (EUR)	LU0390856663	1,95%	40,00%
Alpha 15 (EUR)	LU0607983896	2,00%	60,00%
Alpha 10 MA Fund (EUR)	LU0445386369	1,70%	60,00%
Asian Focus Equity Fund (EUR)	LU0173782102	1,50%	60,00%
Asian Focus Equity Fund (USD)	LU0064675985	1,50%	60,00%
Chinese Equity Fund (EUR)	LU0975278499	1,80%	60,00%



Chinese Equity Fund (USD)	LU0975278572	1,80%	60,00%
Danish Bond Fund (DKK)	LU0064319766	0,60%	60,00%
Danish Bond Fund (EUR)	LU0173778845	0,60%	60,00%
Danish Kroner Reserve (DKK)	LU0064321317	0,13%	60,00%
Danish Kroner Reserve (EUR)	LU0173785030	0,13%	60,00%
Danish Mortgage Bond Fund (DKK)	LU0076315968	0,60%	60,00%
Danish Mortgage Bond Fund (EUR)	LU0173779223	0,60%	60,00%
Emerging Consumer Fund (EUR)	LU0390857471	1,50%	60,00%
Emerging Market Bond Fund (EUR)	LU0772926084	1,00%	40,00%
Emerging Market Bond Fund (USD)	LU0772926670	1,00%	40,00%
Emerging Market Bond Fund (EUR)	LU0772927215	1,00%	40,00%
Emerging Market Bond Opportunities Fund (EUR)	LU0772919543	1,20%	40,00%
Emerging Market Corporate Bond Fund (EUR)	LU0637302547	1,20%	40,00%
Emerging Market Corporate Bond Fund (USD)	LU0634509870	1,20%	40,00%
Emerging Market Corporate Bond Fund (EUR)	LU0637304675	1,20%	40,00%
Emerging Market Local Debt Fund (EUR)	LU0772932488	0,90%	60,00%
Emerging Market Local Debt Fund (USD)	LU0772933023	0,90%	60,00%
Emerging Markets Focus Equity Fund (EUR)	LU0772938410	1,50%	60,00%
Emerging Markets Focus Equity Fund (USD)	LU0772938923	1,50%	60,00%
Emerging Markets Small Cap Fund (EUR)	LU0975279117	1,60%	40,00%
Emerging Stars Equity Fund (EUR)	LU0602539867	1,50%	60,00%
Emerging Stars Equity Fund (USD)	LU0602539602	1,50%	60,00%
European Corporate Bond Fund (EUR)	LU0173783928	0,60%	60,00%
European Covered Bond Fund (EUR)	LU0076315455	0,60%	60,00%
European Cross Credit Fund (EUR)	LU0733673288	1,00%	60,00%
European Diversified Corporate Bond Fund (EUR)	LU0533591169	0,50%	60,00%
European Financial Debt Fund (EUR)	LU0772944145	1,00%	60,00%
European High Yield Bond Fund (EUR)	LU0141799501	1,00%	40,00%
European High Yield Bond Fund (HB) (USD)	LU0637316331	1,00%	40,00%
European Small and Mid Cap Equity Fund (EUR)	LU0417818407	1,30%	60,00%
European Value Fund (EUR)	LU0064319337	1,50%	40,00%
European Value Fund (USD)	LU0968814441	1,50%	40,00%
Flexible Fixed Income Fund (EUR)	LU0915365364	0,80%	60,00%
Flexible Fixed Income Plus Fund (EUR)	LU0634509953	1,20%	60,00%
Global Bond Fund (EUR)	LU0064321150	0,60%	60,00%
Global Climate and Environment Fund (EUR)	LU0348926287	1,50%	60,00%
Global Dividend Fund (EUR)	LU0772951355	1,50%	60,00%
Global Dividend Fund (USD)	LU0772951868	1,50%	60,00%
Global High Yield Bond Fund (EUR)	LU0787834513	1,00%	40,00%
Global High Yield Bond Fund (USD)	LU0476539324	1,00%	40,00%
Global Ideas Equity Fund (EUR)	LU1002951728	1,50%	60,00%
Global Ideas Equity Fund (USD)	LU1002951645	1,50%	60,00%
Global Opportunity Fund (EUR)	LU0975280552	1,50%	40,00%
Global Portfolio Fund (EUR)	LU0476541221	0,75%	60,00%



Global Real Estate Fund (EUR)	LU0705259769	1,50%	40,00%
Global Real Estate Fund (USD)	LU0705260189	1,50%	40,00%
Global Small Cap Fund (EUR)	LU1029333462	1,50%	40,00%
Global Small Cap Fund (USD)	LU1029332142	1,50%	40,00%
Global Stable Equity Fund (EUR)	LU0112467450	1,50%	60,00%
Global Stable Equity Fund - Euro Hedged (EUR)	LU0278529986	1,50%	60,00%
Heracles Long/Short MI Fund (EUR)	LU0375726329	2,00%	40,00%
Indian Equity Fund (EUR)	LU0637335638	1,80%	40,00%
Indian Equity Fund (USD)	LU0634510613	1,80%	40,00%
International High Yield Bond Fund - USD Hedged (USD)	LU0826393653	1,00%	40,00%
International High Yield Bond Fund - USD Hedged (EUR)	LU0826393067	1,00%	40,00%
Latin American Equity Fund (EUR)	LU0309468808	1,60%	40,00%
Latin American Equity Fund (USD)	LU0607982732	1,60%	40,00%
Low Duration US High Yield Bond Fund - HB (EUR)	LU0602537499	1,00%	40,00%
Low Duration US High Yield Bond Fund - BP (EUR)	LU0602537226	1,00%	40,00%
Low Duration US High Yield Bond Fund (USD)	LU0602537069	1,00%	40,00%
Multi Asset Fund (EUR)	LU0445386369	1,70%	60,00%
Multi Manager Fund Growth (EUR)	LU0946759445	1,50%	60,00%
Multi Manager Fund Growth (USD)	LU0946760021	1,50%	60,00%
Multi Manager Fund Balanced (EUR)	LU0946760294	1,25%	60,00%
Multi Manager Fund Balanced (USD)	LU0946760708	1,25%	60,00%
Multi Manager Fund Moderate (EUR)	LU0946760880	1,00%	60,00%
Multi Manager Fund Moderate (USD)	LU0946761342	1,00%	60,00%
Nordic Equity Fund (EUR)	LU0064675639	1,50%	60,00%
Nordic Equity Fund (USD)	LU0607985677	1,50%	60,00%
Nordic Equity Small Cap Fund (EUR)	LU0278527428	1,50%	60,00%
Nordic Equity Small Cap Fund (NOK)	LU0278528152	1,50%	60,00%
Nordic Ideas Equity Fund (EUR)	LU0915372659	1,50%	60,00%
Nordic Ideas Equity Fund (SEK)	LU0915373897	1,50%	60,00%
North American All Cap Fund (EUR)	LU0772958012	1,50%	40,00%
North American All Cap Fund (USD)	LU0772958525	1,50%	40,00%
North American All Cap Fund (EUR)	LU0772959259	1,50%	40,00%
North American High Yield Bond Fund (USD)	LU0826399429	1,00%	40,00%
North American High Yield Bond Fund (EUR)	LU0826398702	1,00%	40,00%
North American Small Cap Fund (EUR)	LU0826404526	1,50%	40,00%
North American Small Cap Fund (USD)	LU0826405176	1,50%	40,00%
North American Value Fund - HB (EUR)	LU0255617598	1,50%	40,00%
North American Value Fund - BP (EUR)	LU0173783092	1,50%	40,00%
North American Value Fund (USD)	LU0076314649	1,50%	40,00%
Norwegian Bond Fund (EUR)	LU0173781559	0,60%	60,00%
Norwegian Bond Fund (NOK)	LU0087209911	0,60%	60,00%
Norwegian Equity Fund (EUR)	LU0173784223	1,50%	60,00%
Norwegian Equity Fund (NOK)	LU0081952003	1,50%	60,00%



Norwegian Kroner Reserve (EUR)	LU0173786863	0,13%	60,00%
Norwegian Kroner Reserve (NOK)	LU0078812822	0,13%	60,00%
Renminbi High Yield Bond Fund (EUR)	LU1221952101	1,50%	40,00%
Stable Emerging Markets Equity Fund (EUR)	LU0637345785	1,80%	60,00%
Stable Emerging Markets Equity Fund (USD)	LU0634510886	1,80%	60,00%
Stable Return Fund (EUR)	LU0227384020	1,50%	60,00%
Stable Return Fund (USD)	LU1032955483	1,50%	60,00%
Swedish Bond Fund (EUR)	LU0173781047	0,60%	60,00%
Swedish Bond Fund (SEK)	LU0064320186	0,60%	60,00%
Swedish Kroner Reserve (EUR)	LU0173785626	0,13%	60,00%
Swedish Kroner Reserve (SEK)	LU0064321663	0,13%	60,00%
Tactical Allocation Balanced (EUR)	LU0091716570	1,25%	60,00%
Tactical Allocation Conservative (EUR)	LU0091716737	1,00%	60,00%
US Corporate Bond Fund (EUR)	LU0458979076	0,70%	40,00%
US Corporate Bond Fund (USD)	LU0458979746	0,70%	40,00%
US Corporate Bond Fund (EUR)	LU0458980595	0,70%	40,00%
US High Yield Bond Fund (EUR)	LU0278531701	1,00%	40,00%
US High Yield Bond Fund (USD)	LU0278531610	1,00%	40,00%
US High Yield Bond Fund (EUR)	LU0410959117	1,00%	40,00%
US Total Return Bond Fund (EUR)	LU0826414087	1,10%	40,00%
US Total Return Bond Fund (USD)	LU0826414673	1,10%	40,00%
US Total Return Bond Fund (EUR)	LU0826415480	1,10%	40,00%

