

Luxembourg, May 22, 2024

# Information on investor protection

## Preface

This Information on Investor Protection does not fully cover all aspects of the investment business and its contractual issues. This information supplements any contractual agreements between you and Vontobel Asset Management. If any contradictions exist, the respective contractual agreement will take precedence. In some passages we refer to other documents, which Vontobel Asset Management will provide to you or which you may obtain from us free of charge. In addition, you will find important details about our business relationship with you and the associated interaction and communication activities. For more detailed information please refer to our website [vontobel.com/am](https://vontobel.com/am).

## 1. Subscription and redemption requests and payments to be made to investors

Any investment in an undertaking for collective investment ("UCI") or any related product should only be made after reviewing the latest regulatory documents.

The prospectuses, the articles of incorporation, K(I)IDs (Key (Investor) Information Documents) and the semi- and annual reports of every UCI are available from the website and will be provided free of charge, on request. The other regulatory documents are available on request from the registered office of each UCI.

In accordance with the latest prospectus of each UCI, any investor's request in relation to the subscription or redemption of their shares and other payments can be addressed directly to their usual bank/intermediary, alternatively the request may be sent directly to the following entities:

### **For retail investors: Management Company & Global Distributor**

Vontobel Asset Management S.A.  
18, rue Erasme  
L-1468 Luxembourg  
Luxembourg  
Email: [luxembourg@vontobel.com](mailto:luxembourg@vontobel.com)

### **For professional investors only: Administrator (Central Administration of the Fund), Transfer Agent and Registrar for the UCI:**

CACEIS Investor Services Bank S.A. 14, Porte de  
France  
L-4360 Esch-sur-Alzette  
Luxembourg

Subscription applications can be sent by fax, by post or by any other communication means accepted by the administrator and must be received by the administrator, one of the UCI's distributors or any other duly appointed agent of the UCI on a business day before 3.45 p.m. Luxembourg time (cut-off time). Exceptions apply for certain sub-funds. Please refer to the prospectus for further details.

Investments in financial products may involve risk. Investors may lose some or all of their capital, as the capital in the UCI is not guaranteed.

## **2. Investors voting rights**

Investors should note that any investor may only exercise their investor rights in full directly against each UCI, in particular the right to participate in annual general meetings, if the investor is entered in the UCI's register of shareholders themselves and in their own name. In cases where an investor has invested in the UCI through an intermediary that undertakes the investment in its own name but on behalf of the investor, the investor may not necessarily be able to assert all investor rights directly against the UCI. Investors are therefore advised to enquire as to their rights.

## **3. Organisation and policies**

### **3.1. Language and means of communication**

You can communicate with Vontobel Asset Management in one of the following languages: German, English. If available, contracts and notifications as well as client documents will be provided in the selected language. In general, we will communicate with you in writing. We accept orders and other information per telephone, fax, or e-mail if you agree to communicate via these channels. If you communicate with us via one of these channels, we reserve the right to contact you in the same manner.

### **3.2. Order execution (best execution)**

Best execution is the obligation to take all appropriate steps to obtain the best-possible result when executing transactions in securities and other financial instruments via other affiliates or through third-party brokers. We have summarized the principles for the execution of client orders in our Best Execution policies of the respective legal entity of Vontobel Asset Management. These policies are available at [vontobel.com/mifid](http://vontobel.com/mifid).

### **3.3. Conflicts of interest**

Vontobel Asset Management has taken measures so that conflicts of interest do not affect the interests of clients. Such conflicts of interest may exist between us, our executive board members, our employees and contractually affiliated intermediaries, and other people associated with us either directly or indirectly, and our clients, or between clients. We have summarized these measures for you in our Conflict of Interest policies of the respective legal entity of Vontobel Asset Management. These policies are available at [vontobel.com/mifid](http://vontobel.com/mifid).

### **3.4. Disclosure of transactions in securities and other financial instruments**

Vontobel Asset Management may be obliged to report to the supervisory authorities all transactions that it has carried out with listed securities. Reports must contain identification details about the buyer and/or seller of these securities and about the person who issued the trade order. If this person is a legal entity, it must be reported with its legal entity identifier (LEI).

### **3.5. Recording of calls and electronic communication**

Vontobel Asset Management is obliged to record all electronic communication associated with a transaction, including communication with clients.

Consequently, Vontobel Asset Management may not engage in any transaction-related communication with you via channels on which Vontobel Asset Management cannot record the communication (e.g. external instant messaging services). Moreover, Vontobel Asset Management records the key contents of transaction-related personal conversations in logs in order to ensure that the recommendations issued to you are traceable. The records are stored on a durable medium in such a way that ensures an appropriate level of confidentiality and protection against manipulation.

3/4 By entering into a business relationship with Vontobel Asset Management or contacting Vontobel Asset Management by electronic means, you consent to the aforementioned recording and storage methods. You have the right to request copies of your records in exchange for an expense fee.

### **3.6. Handling complaints**

Suggestions, comments and feedback are best sent directly to your personal relationship manager or contact person. If you would like to submit a formal complaint concerning an aspect of your relationship with Vontobel Asset Management, you can do so in accordance with our complaint management principles.

In a nutshell, complainants may direct complaints at any time to the address of the Management Company. To enable complaints to be handled expeditiously, complaints should indicate the sub-fund and share class in which the person making the complaint holds shares in the relevant UCI. Complaints can be made in writing, by telephone or in a client meeting. Written complaints will be registered and filed for safekeeping. Verbal complaints will be documented in writing and filed for safekeeping. Written complaints may be drawn up in English, German or in an official language of the complainant's EU home country.

Information regarding the possibility and procedure of the filing of a complaint may be obtained at [vontobel.com/am/complaints-policy.pdf](https://vontobel.com/am/complaints-policy.pdf)

### **3.7. Collective redress mechanisms at the EU and national level**

Directive (EU) 2020/1828 introduced general rules for the adoption by each EU Member State of rules governing representative action mechanisms for the protection of consumers' collective interests at the European and national levels. Therefore, reference is made to the rules provided by each EU Member State, which, according to the aforementioned directive provides that:

- national or cross-border representative actions to protect collective consumer interests in cases of collective damage may be brought by legitimate non-profit entities (e.g. consumer organizations or independent public bodies);
- actions that can be brought for the protection of investors can be injunctive and compensatory;
- sanctions are provided for by Member States in case of non-compliance with the decisions issued.

## **4. Sustainable Finance**

Vontobel Asset Management integrates sustainability risks in its investment decision-making and investment advice processes and provides the result of the assessment of the likely impacts of sustainability risks on the returns of the financial products it makes available or advises on unless clients instruct otherwise. The integration of sustainability risks in the investment decision-making or advisory process are reflected in Vontobel Group's ESG Investing and Advisory Policy, available at [vontobel.com/SFDR](https://vontobel.com/SFDR). Information on how the ESG Investing and Advisory Policy is implemented in the product offered or advice given may be obtained from [vontobel.com/SFDR](https://vontobel.com/SFDR).

Information on whether and how the sub-funds exercise the voting rights accruing to them is available at [vontobel.com/am/voting-policy.pdf](https://vontobel.com/am/voting-policy.pdf).

## **5. GDPR**

The sharing of information described entails the transfer of data to a country which may not provide the same level of personal data protection as is available in the European Economic Area. The delegates are required to keep the information confidential and use it only for the purposes for which they have been made available to them and appropriate measures have been implemented.

Data subjects such as representatives, and/or authorized signatories and/or beneficial owners of investors (the "Data Subjects") may request access to, rectification of or deletion of any personal data provided to or processed by any of the parties above in accordance with applicable law. In particular, Data Subjects may at any time object, on request and free of charge, to the processing of their personal data for direct marketing purposes. Data Subjects should

address such requests to the registered office of the Management Company.

For further information about the treatment of your personal data in regard to this or your data subject rights, please consult our complete information at: [vontobel.com/gdpr](http://vontobel.com/gdpr).

You are authorized to access data relating to you at reasonable intervals free of charge, and may request correction of that data, if necessary. You may contact CACEIS Investor Services Bank S.A. at [CustomerServices@caceis.com](mailto:CustomerServices@caceis.com) to exercise these rights.

## 6. Contacts

### **Vontobel Asset Management S.A.**

18, rue Erasme

L-1468 Luxembourg

Telephone: +352 263474-1

E-mail: [luxembourg@vontobel.com](mailto:luxembourg@vontobel.com)

Vontobel Asset Management S.A., with its registered office in 18, rue Erasme L-1468 Luxembourg, Grand Duchy of Luxembourg, is a wholly-owned subsidiary of Vontobel Holding AG, Zurich, and is licensed and regulated by the Luxembourg financial supervisory authority, CSSF, as management company for collective investment schemes subject to Chapter 15 of the 2010 Law and as an external manager of alternative investment funds (AIFM) pursuant to Chapter 2 of the Law of 12 July 2013.

Vontobel Asset Management S.A. offers both collective and individual portfolio management and investment consulting related to different financial instruments.

### **Disclaimer**

This publication is solely for the purpose of informing clients about how Vontobel Asset Management S.A. implements the applicable statutory requirements on investor protection. It does not constitute an offer or solicitation by or on behalf of Vontobel Asset Management S.A. to utilize a service, buy or sell securities or similar financial instruments or participate in a specific trading strategy in any jurisdiction.

For more information on the Vontobel funds range and UCI documentation please refer to [vontobel.com/am](http://vontobel.com/am).