

# COMMON FUND PROSPECTUS ELITE ALFRED BERG FUNDS (UCITS)

Valid as of January 12, 2023



This prospectus covers only UCITS-funds operating with name Elite Alfred Berg that are managed by Evli Fund Management Company Ltd. Information on all funds managed by Evli Fund Management Company and prospectuses are available at www.evli.com/funds.

# **Evli Fund Management Company Ltd**

Evli Fund Management Company Ltd (hereinafter 'the Management Company'), founded on March 8, 1988, is a Finnish limited liability company as referred to in the Act on Common Funds whose line of business is to engage in mutual fund operations, asset management and other related activities. The Management Company also has a license granted by the Finnish Financial Supervisory Authority to engage in activities related to Alternative investment funds (AIFMD). The Management Company is domiciled in Helsinki, Finland, and has share capital of EUR 1,700,000. The Management Company is a fully-owned subsidiary of Evli Plc (hereinafter 'Evli').

The Management Company invests assets acquired from the public on behalf of the unit holders in accordance with the fund rules approved by the Finnish Financial Supervisory Authority. The Management Company acts in its own name on behalf of the fund and exercises the rights related to the assets in the fund.

In its operations, the Management Company treats its unit holders equally. The Management Company aims to avoid conflicts of interest in its operations and, in the event of conflicts of interest, ensure that the mutual funds managed by the Management Company, their unit holders and other clients are treated equally.

The funds in scope of this prospectus were previously managed by EAB Fund Management Company. EAB Fund Management Company merged to Evli Fund Management Company on 31.10.2022 and management of the funds transferred to Evli Fund Management Company Ltd.

# **Board of Directors and Managing Director**

Chairman

Maunu Lehtimäki, Managing Director, Evli Plc

Members

Janne Lassila, Director, Evli Plc Juho Mikola, Chief Financial Officer, Evli Plc Outi Helenius, M.Sc. Lea Keinänen\*, MBA Petri Olkinuora\*, M.Sc. (Tech), MBA, professional Board member \*Independent Board Representative elected by the unit holders

Managing Director Kim Pessala

#### **Auditors**

The auditor of the Management Company and all the mutual funds under its control is PricewaterhouseCoopers Oy (with Jukka Paunonen (APA) as the principally responsible auditor), with the deputy auditor being Mikko Nieminen (APA).



#### Custodian

The custodian of the common funds managed by the Management Company is Skandinaviska Enskilda Banken, Helsinki Branch. The primary line of business of the custodian is other banking activities, and it is domiciled in Stockholm (Sweden).

Custodian's contact information:

Skandinaviska Enskilda Banken AB (publ) Helsingfors filialen

Business ID: 0985469-4

Postal address: PO Box 630, FI-00101 Helsinki, Finland Street address: Eteläesplanadi 18, 00130 Helsinki, Finland

It is the task of the custodian to ensure that the activities of the common funds and the Management Company comply with legislation, rules of the funds and regulations issued by the authorities, as well as see to other duties for which the custodian is responsible under the Act on Common Funds and Act on Alternative Investment Funds Managers. The custodian may use one or several sub-custodians, if necessary. Up-to-date information about the sub-custodians is available from the Management Company.

The assets of the Fund are kept separate from the asses of other funds, the Management Company and the Custodian. The assets of the Fund cannot be used for covering the liabilities of the Management Company or Custodian. The Custodian cannot re-use the assets of the Fund in its custody.

# Outsourcing functions and use of agents

The Management Company has the right to use external administrative and counselling services in managing the common fund activities, such as portfolio management, accounting, IT, administrative, subscription and redemption assignment receipt services.

# **Broking of common funds managed by the Fund Management Company**

Evli or its tied agent is responsible for subscription and redemption assignment receipt services.

# Marketing

The Funds are marketed by Evli Plc.

# **Outsourcing of the Fund Management Company's unit register**

The maintenance and administration of the Funds' unit register is outsourced partially to the following agents:

Nordnet AB Finnish Branch

# Principles of ownership employed by mutual funds managed by the Management Company and by the Management Company as an asset manager

The Board of Directors of the Management Company (Evli Fund Management Company) approved the principles regarding ownership on September 16, 2020. These principles of ownership are applied when the Management Company invests assets of the funds under its management and assets under its asset management in the equities of companies that are traded in a regulated market and in a corresponding trading venue and, where applicable, in investments in various fixed income instruments.

#### **Ownership**

The Management Company has a primary obligation to monitor the best interests of the unit



holders of the funds managed by it, the assets under asset management and the owners of the assets. This means aiming to achieve value increase for the assets under fund management and asset management within the limits of the investment strategy and risk level. In ownership, it is important to note that the mutual funds managed by the Management Company and the assets under asset management are nearly always minority shareholders in the companies that they own, but despite this, the Management Company believes that it can impact the decision-making of the companies invested in by communicating its objectives and practices clearly and transparently to the companies.

Ownership aims to achieve value increase for the holdings in mutual funds and asset management over the long term. The Management Company requires the companies invested in to engage in good ownership and corporate governance, by complying with the corporate governance code of the Securities Market Association <sup>1</sup>, for example, or corresponding foreign guidelines. In addition to these, environmental and social responsibility are very important issues. As a whole, the Management Company's approach towards factors related to environmental, social and corporate governance are determined by the Principles for Responsible Investment of Evli Group's asset management <sup>2</sup>. In addition, Evli Group has separate Principles for Climate Change <sup>3</sup>, which specify the procedures related to climate change in investments.

The Management Company's ownership methods are: 1. engagement with companies either independently or together with other investors, 2. participation in general meetings of shareholders and 3. discussions during regular company meetings between company representatives and the portfolio managers who make investment decisions or responsible investing team. The Management Company does not use proxy advisors when participating in general meetings of shareholders.

#### 1. Engagement with companies

The Management Company engages with companies both independently and together with other investors. The companies subject to engagement are selected on the basis of factors set out in Evli Group's Principles for Responsible Investment and Principles for Climate Change. The above-mentioned factors are the same for all investment strategies. Engagement activities are reported annually in Evli Group's responsible investment annual report. The Management Company does not use equity lending as part of engagement activities.

The purpose of the Management Company's engagement activities is to change companies' practices so that they become more responsible. If a company is not prepared to change its practices, the Management Company may withdraw its holding in the company.

The Management Company also carries out collaborative engagement with other investors when the target and goals of collaborative engagement are in line with Evli's Principles for Responsible Investment / Principles for Climate Change.

#### 2. Participation in general meetings of shareholders

The Management Company participates in general meetings of shareholders and extraordinary general meetings of shareholders primarily only in Finland. It can also provide voting instructions to selected foreign general meetings of shareholders without participating in the meetings itself. If the interests of mutual funds managed by the Management Company differ, voting rights are exercised in the best interests of each individual fund. The investment strategies of the individual funds managed by the Management Company do not require participation in general meetings of shareholders. The criteria for participation in general meetings of shareholders are the stake in the company, the companies' proportion in investments, the matters dealt with in the general meetings, and engagement possibilities. The final decision regarding participation in a general meeting of shareholders is made by the portfolio manager in charge of the fund's investment decisions or responsible investing team.



#### 3. Company meetings

Some of the investment strategies of the funds managed by the Management Company require the portfolio manager who makes investment decisions to regularly meet with company representatives. In addition, responsible investing team meets companies concerning responsibility-related themes.

In addition to the above-mentioned procedures, the Management Company's portfolio managers continuously monitor companies and the corporate actions that affect them, including news and stock exchange releases, and dividends, share issues, mergers, and general meetings of shareholders, for example.

The implementation of the principles of the Management Company's ownership is reported on the company's website and as part of the mutual fund's semi-annual reports and annual reports.

#### **Remuneration practices**

The objective of the Evli Group's remuneration model is to support the implementation of the company's strategy as well as promote its competitiveness and long-term financial success. A further aim is to contribute to a positive trend in Evli's shareholder value, committing the company employees to the company's objectives in the long run.

A competitive fixed basic salary constitutes a solid foundation for maintaining and constantly developing basic functions. To promote both Evli's short-term growth objectives and the attainment of its strategic goals, the company also has an annually adopted reward system based on annually varying salary elements. The long-term incentive systems, in turn, are in place to support the company's strategic development and to commit the key persons to Evli's operations. Further information on remuneration practices can be found at the address www.evli.com.

#### **FUND-SPECIFIC INFORMATION**

#### Common funds managed by the Fund Management Company

FUND	FUND TYPE	START DATE	RULES CONFIRMED	MERGER HISTORY
Elite Alfred Berg Optimal Allocation	Fund of funds	31 December 1993	26 September 2022	Alfred Berg Optimal Europe Fund merged into Alfred Berg Optimal Fund on 23 March 2009. Alfred Berg Optimal Fund was renamed as Alfred Berg Optimal Allocation Fund on 1 December 2015. Alfred Berg Optimal Allocation Fund was renamed as Elite Alfred Berg Optimal Allocation Fund on 9 September 2018. Elite Alfred Berg Optimal Optiminon-UCITS Fund merged into Elite Alfred Berg Optimal Allocation Fund on 4 December 2018. Elite Alfred Berg Trend Fund merged into Elite Alfred Berg Optimal Allocation Fund on 9 December 2019.
Elite Alfred Berg Yield	Fixed income fund	20 December 2012	26 September 2022	Eufex Aegis non-UCITS Fund merged into EPL Yield Fund on 23 April 2015. EPL Yield Fund was renamed as Elite Yield Fund on 7 September 2016. Elite Yield Fund was renamed on 9 September 2018 as Elite Alfred Berg Yield Fund. Elite Alfred Berg Fixed Income Allocation Fund merged into Elite Alfred Berg Yield Fund on 18 December 2018.
Elite Alfred Berg Equity	Equity fund	28 May 2014	26 September 2022	Elite Equity Fund was created in the merger or Eufex Hedge Fund, Eufex ActiveAlpha UCITS Fund and EPL Tactical UCITS Fund. The merger took place on 28 May 2014, when the fund started its operation. Elite Equity Fund was renamed as Elite Alfred Berg Equity Fund on 9 September 2018. Elite Alfred Berg Osakevarainhoito Sijoitusrahasto merged into Elite Alfred Berg Equity Fund on 11 December 2018.

<sup>&</sup>lt;sup>1</sup> The Corporate Governance Code - Securities Market Association (cgfinland.fi)

<sup>&</sup>lt;sup>2</sup> Evli Wealth Management Climate Change Principles

<sup>&</sup>lt;sup>3</sup> Evli Wealth Management Climate Change Principles



# OTHER COMMON FUNDS AND ALTERNATIVE FUNDS MANAGED BY THE FUND MANAGEMENT COMPANY

Up-to date information on other funds managed by the management company is available at <a href="https://www.evli.com/funds">www.evli.com/funds</a> and in the prospectuses of the funds.

# Basic information on the common funds and their investments

FUND	Activity started	Invest ment style	Primary investment area	Primary investments	Investment ratio equities, %	Duration maximum	Use of derivative instruments	Key risks	Risk category
Elite Alfred Berg Optimal Allocation	31.12.1993	Active	World	Shares of equity and fixed income funds	0% – 100%	No limit	Hedging investments and pursuing income	Equity market risk Interest rate risk	3
Elite Alfred Berg Yield	20.12.2012	Active	World	Shares of fixed income funds (incl. ETF)	N/A	No limit	Hedging investments and pursuing income	Interest rate risk Equity market risk	2
Elite Alfred Berg Equity	28.5.2014	Active	World	Shares of equity funds (incl. ETF), equities	-100% – 200%	N/A	Hedging investments and pursuing income	Equity market risk Interest rate risk	4

# Detailed information on the common funds and their investments

FUND	Investment objectives	Portfolio composition	Applied methodologies to achieve investment objectives
Elite Alfred Berg Optimal Allocation	The objective of investment activities is to invest the Fund's assets in various asset classes through active asset management and to provide the Fund's unit-holders with long-term returns in excess of the benchmark return (50% MSCI AC World Net TR EUR, 50% Euribor 3-month) by investing the Fund's assets in accordance with its rules and the Mutual Funds Act.	The Fund's assets are invested in global fixed income and equity markets, primarily in mutual funds and UCITS (including ETFs), secondarily directly in securities. Investments are widely diversified into shares and bonds of various companies. The fund's equity investments are, in principle, traded on a regulated, regularly operating, recognized and publicly available marketplace.  The geographical diversification of the fund's investment portfolio is not limited. There is no limit to the maximum or minimum amount of market value of the target companies in the fund's investment activities. The distribution between the value and growth shares of the fund's investment portfolio is not limited. There is no limit to the minimum or maximum credit rating of the target companies involved in the Fund's fixed income investments.	The investment decisions in the fund's investment portfolio are based on the market outlook. The market view is formed by analyzing global themes and trends that are believed to have a significant impact on the future prospects of different markets, industries and portfolio companies. The key factors in the analysis and the final selection of investment targets are the valuation level of the investment targets, as well as the financial situation and estimated growth potential of the target companies.
Elite Alfred Berg Yield	The objective of investment activities is to generate returns for its unit-holders through active asset management that exceed the general price increase (inflation) by investing the fund's assets primarily in fixed income funds (including ETFs), bonds issued by entities, governments or other entities, money market instruments and deposits.	The fund's assets are invested in various fixed income categories with global diversification, mainly in bonds and fixed income funds issued by governments, companies and financial institutions.  The geographical diversification of the fund's investment portfolio is not limited. The fund's investment activities are not limited to the maximum or minimum amount of the market value of the target companies. There is no limit to the minimum or maximum credit rating of the target companies related to the fund's fixed income investments.	Investment decisions in the fund's investment portfolio are based on the active management of the fund's allocation, which assesses the tactical weighting and interest rate and credit risk of the investment portfolio's fixed income asset classes. The fund aims to add value through active decision-making and to achieve the best risk / return ratio in each market situation, regardless of index trends. In the analysis prior to the investment decision, the key factors at the investment target level are the special features and relative valuation level of the bond, as well as the financial situation and position of the target companies in the industry.
Elite Alfred Berg Equity	The objective of the investment activities is to generate long-term returns for the Fund's unit-holders in excess of the benchmark return (MSCI AC World TR Net EUR) through active asset management, by investing the Fund's assets in accordance with its rules and the Mutual Funds Act.	The fund's assets are invested primarily in equities or units in mutual funds and UCITS (including ETFs) that invest their assets in the stock market. The fund's equity investments are, in principle, traded on a regulated, regularly operating, recognized and open marketplace.  The geographical diversification of the fund's investment portfolio is not limited. The fund's investment activities are not limited to the maximum or minimum amount of the market value of the target companies. The distribution between the value and growth shares of the fund's investment portfolio is not limited.	The investment decisions in the fund's investment portfolio are based on the market outlook. The market view is formed by analyzing global themes and trends that are believed to have a significant impact on the future prospects of different markets, industries and portfolio companies. The key factors in the analysis and the final selection of investment targets are the valuation level of the investment targets, as well as the financial situation and estimated growth potential of the target companies.



# Unit series-specific information of common funds

FUND	Unit series	Unit type	ISIN	Minimum subscription, EUR	Investment portfolio turnover, %	Annual return, % (2021)
	A	Accumulation unit	FI4000399985	50	27,4 %	12,4 %
	A Income	Income unit	FI0008803671	500,000	27,4 %	14,0 %
	A Accumulation	Accumulation unit	FI0008803689	500,000	27,4 %	14,0 %
Elite Alfred Berg Optimal Allocation	В	Accumulation unit	FI4000399993	500,000	27,4 %	13,9 %
	С	Accumulation unit	FI4000359385	1,000,000	27,4 %	14,7 %
	D	Accumulation unit	FI4000359393	5,000,000	27,4 %	15,1 %
	E	Accumulation unit	FI4000359401	10,000,000	27,4 %	15,5 %
	Α	Accumulation unit	FI4000052584	50	404,4 %	-0,2 %
	С	Accumulation unit	FI4000252275	1,000,000	404,4 %	-0,1 %
Elite Alfred Berg Yield	D	Accumulation unit	FI4000252291	5,000,000	404,4 %	0,1 %
	E Income	Income unit	FI4000359427	10,000,000	404,4 %	0,3 %
	E	Accumulation unit	FI4000252309	10,000,000	404,4 %	0,3 %
	A	Accumulation unit	FI4000096920	50	25,6 %	25,3 %
Elite Alfred Berg Equity	С	Accumulation unit	FI4000260906	1,000,000	25,6 %	27,0 %
	D	Accumulation unit	FI4000260914	5,000,000	25,6 %	28,1 %
	E	Accumulation unit	FI4000260922	10,000,000	25,6 %	28,8 %

# **Common funds fee information**

FUND		Subscription	Subscription	Redemption	Redemption	Fixed annual administrative	Fixed annual administrative	Ongoing
Unit series		fee max, %	fee in force, %	fee max, %	fee in force, %	fee max, %	fee in force, %	annual charges % (2021)
	А	3.00%	0.00%	3.00%	0.00%	3.00%	3.00%	3,38 %
	ΑT	3.00%	0.00%	3.00%	0.00%	3.00%	1.75%	2,13 %
	ΑK	3.00%	0.00%	3.00%	0.00%	3.00%	1.75%	2,13 %
Elite Alfred Berg Optimal Allocation	В	3.00%	0.00%	3.00%	0.00%	3.00%	1.50%	1,88 %
	С	3.00%	0.00%	3.00%	0.00%	3.00%	1.20%	1,58 %
	D	3.00%	0.00%	3.00%	0.00%	3.00%	0.80%	1,18 %
	Ε	3.00%	0.00%	3.00%	0.00%	3.00%	0.50%	0,88 %
	А	2.00%	0.00%	1.00%	0.00%	2.00%	1.00%	1,38 %
	C	2.00%	0.00%	1.00%	0.00%	2.00%	0.85%	1,23 %
Elite Alfred Berg Yield	D	2.00%	0.00%	1.00%	0.00%	2.00%	0.70%	1,08 %
	ET	2.00%	0.00%	1.00%	0.00%	2.00%	0.50%	0,88 %
	Ε	2.00%	0.00%	1.00%	0.00%	2.00%	0.50%	0,88 %
	A	3.00%	0.00%	3.00%	0.00%	3.00%	3.00%	3,40 %
	C	3.00%	0.00%	3.00%	0.00%	3.00%	1.50%	1,90 %
Elite Alfred Berg Equity	D	3.00%	0.00%	3.00%	0.00%	3.00%	1.00%	1,40 %
	E	3.00%	0.00%	3.00%	0.00%	3.00%	0.50%	0,90 %



# Common funds' risk categories and investor target groups

RISK CATEGORY	Fund	Investor target group
2	Elite Alfred Berg Yield	The fund is particularly suited for an investor willing to primarily invest in the fixed income market, has a below-average loss absorption capacity and risk appetite and plans to keep the investment in the fund for a minimum of 3 years.
3	Elite Alfred Berg Optimal Allocation	The fund is particularly suited for an investor willing to primarily invest in the equity and fixed income markets, has an average loss absorption capacity and risk appetite and plans to keep the investment in the fund for a minimum of 5 years.
4	Elite Alfred Berg Equity	The fund is particularly suited for an investor willing to primarily invest in the equity market, has an above-average loss absorption capacity and risk appetite and plans to keep the investment in the fund for a minimum of 5 years.

# Benchmarks used by the common funds

Fund	Benchmark	Benchmark managed by
Elite Alfred Berg Yield	5 % ICE BofA Diversified EM External Debt Sovereign Bond Index, 30 % ICE BofA Global Government Index, 5 % ICE BofA Euro Currency 3-Month Deposit Offered Rate Constant Mat., 20 % ICE BofA Global Corporate Index, 7,50 % ICE BofA Euro Developed Markets High Yield Constrained Index, 7,50 % ICE BofA US High Yield Index, 5 % ICE BofA Diversified EM Sovereign Bond Index, 20 % ICE BofA Euro Corporate Index	ICE Data Indices LLC
Elite Alfred Berg Optimal Allocation	50 % MSCI AC World Net TR EUR 20 % Bloomberg Barclays Euro Aggregate Treasury TR 15 % Bloomberg Barclays Euro Aggregate Corporate TR 7,5 % Bloomberg Barclays Global High Yield TR (Eur Hedged) 2,5 % J.P. Morgan EMBI Global Core Hedged EUR 2,5 % J.P. Morgan Government Bond Index Emerging Markets Global 10% Cap 1% Floor 2,5 % Euribor 3-month index	MSCI Inc Bloomberg Index Services Limited JPMorgan Chase & Co European Money Markets Institute (Euribor)
Elite Alfred Berg Equity	MSCI AC World TR Net EUR	MSCI Inc

With regard to the funds it manages, the Management Company uses benchmarks pursuant to the EU Benchmarks Regulation in comparing the funds' returns and calculating the performance fee. Substitute benchmarks have been set for the benchmarks to which the Management Company will switch in case the benchmark materially changes or ceases to be provided. The substitute benchmarks have been confirmed in the benchmark-related continuity plan approved by the Board of Directors of the Management Company. The use of benchmarks and substitute benchmarks are managed by the Management Company in accordance with the benchmark-related continuity plan.

#### Information on the funds in accordance with Sustainable Finance Disclosure Regulation

Below is presented the sustainability information for the funds as required by the EU Sustainable Finance Disclosure Regulation 2019/2088 (provision of sustainability-related information in the financial services sector) in accordance with Articles 6 and 7 regarding the consideration of sustainability risks and principal adverse impacts of investment decisions.

All information below in applicable to the following funds:

- Elite Alfred Berg Equity
- Elite Alfred Berg Optimal Allocation
- Elite Alfred Berg Yield



# Consideration of sustainability risk

Sustainability risk refers to an environmental, social or governance event or condition that, if it occurred, could cause an actual or potential material negative impact on the value of an investment.

The fund takes sustainability risks into account in the following ways: the fund's portfolio managers have access to information about investment targets related to the environment, social activities and corporate governance. Portfolio managers use this information when looking for investment risks and opportunities in the fund's investment universe. The assessment of the sustainability risks of the investment objects is part of the assessment of the investment suitability of the investment objects. In addition, sustainability risks are taken into account as part of the fund's investment process. The fund's portfolio managers comply with Evli Group principles of responsible investment, and also requires the management companies of the investment funds to comply with PRI (Principles of Responsible Investment).

The fund's portfolio managers have access to information on financially relevant sustainability risks to support their investment analysis and investment decision-making processes, and factors related to sustainability risks are taken into account, but do not play a decisive role in the decision-making process. Because of that, sustainability risks can have a more significant impact on the value of the fund's investments in the medium and long term. When realized, material sustainability risks can affect the financial performance of the fund's investment instruments, and therefore the fund's return.

# Principal adverse impacts on sustainability factors

The funds do not consider principal adverse impacts of investment decisions on sustainability factors. There is not enough information available on the fund's investment instruments to consider principal adverse impacts.

# Information according to the European Union taxonomy regulation on the funds (EU 2020/852, Article 7)

EU taxonomy regulation defines environmentally sustainable economic activities. The investments included in this financial product do not take into account EU criteria for environmentally sustainable economic activities.



#### **INVESTING IN COMMON FUNDS**

#### Common fund activities

Fund activities are subject to a license in Finland and supervised by the Finnish Financial Supervisory Authority. The funds comply with the valid Act on Common Funds and their registered rules. Unitholders who have subscribed for fund units own the assets of the common fund pro rata to the number of their units. The common fund itself is not a legal person, but it is represented by the Management Company in fund-related matters. The Management Company decides on assets belonging to the fund and exercises the rights derived from the fund. However, the fund is an independent object of taxation. The value of the common fund, and similarly the value of a fund unit, depends on the value of the securities held by the fund and can thereby either increase or decrease. Past performance is no guarantee of future results.

#### Fund unit series and distribution of returns

The fund units of a common fund can be divided into fractions.

The Management Company can issue both income and accumulation units. The holders of income units receive returns from the fund units partially as annual distributions of returns and partially in the form of any increase in value when redeeming (selling) their fund units. The amount of distributable return is annually confirmed by the Annual General Meeting of the Management Company. The return is paid to the unit holders on the basis of the register data of the day of the Annual General Meeting within a month of the Annual General Meeting.

No annual return is paid on the accumulation units, but it is capitalised in full and manifests as faster increase in the value of accumulation units compared with income units. The owners of accumulation units receive returns in the form of any increase in value when redeeming (selling) their fund units. More detailed information about accumulation and income units and distribution of returns is provided in the rules of the funds. We recommend private persons to choose accumulation units.

The Board of Directors of the Management Company can choose to issue several series of fund units, which can differ with regard to the administrative charges collected. A fund unit entitles to a share of the common fund's assets pro rata to the number of fund units, taking into consideration the proportional values of the fund unit series and unit types.

#### Valuation and publication of the fund unit value

Value for the common fund is determined by calculating the difference between fund's assets and liabilities. The value of a fund unit is calculated separately for each unit series by dividing the value of the common fund by the number of issued fund units, taking into consideration any different administrative charges of the unit series and any returns paid on income units. The value of the common fund unit is reported in euros.

The value of the common fund and fund unit is calculated for each day ("Value Day") on which deposit banks are generally open ("Banking Day"). In calculating the value of a common fund, the assets of the common fund are measured at market value. The value of a fund unit on each Value Day is published within two banking days of the Value Day. Thevalue is published on the Management Company's website. More detailed information about the valuation of common funds is provided in the rules of the fund.



# Subscription and redemption of fund units

Fund units can be subscribed and redeemed on every Value Day. The subscription and redemption prices of fund units are published on the Management Company's website.

# Subscription

Fund units are subscribed by submitting a written subscription order to the Management Company/ Evli Plc (Evli)and paying the subscription amount to Evli's customer account by using personal reference number. This reference number is provided when the client relationship is set up. A client relationship is required in order to subscribe for funds. T Fund units may also be subscribed for on My Evli online service or at the address www.evli.com/funds.

The fund unit series concerned by the subscription order must be specified in connection with the subscription order.

The subscription order is considered to be received once the written subscription order has been submitted to the Management Company and the corresponding assets have been recognised on Evli's customer account.

The Management Company has the right to reject the subscription order or postpone its execution if the issuer of the order cannot be identified reliably and the know your customer requirements of the legislation in force are not met or the Management Company has not otherwise been provided with sufficient information for executing the subscription.

A subscription statement can be viewed and printed out through the My Evli online service after the transaction has been carried out. Unless the Management Company is otherwise informed, the fund units will be registered as growth units and entered, free-of-charge, in the fund unit register maintained by the Management Company.

# Redemption

The fund units of investment funds can be converted into money every banking day, either partially or completely.

The order to sell/transfer shares can be given by phone, fax or in the My Evli online service. The funds received from the redemption are transferred to the unit owner's Evli customer account. If the investment fund has to sell the securities it owns, the execution of the redemption order may be delayed due to the market situation and the liquidity of the target market. Redemption is then carried out at the value of the fund unit to be confirmed for the day when the redemption (or partial redemption) is possible. The redemption calculation can be viewed and printed in the My Evli online service after the transaction has been completed.

Fund units are redeemed by submitting a redemption order to the Management Company. The fund unit series concerned by the redemption order must be specified in connection with the redemption order.

The Management Company has the right to reject the redemption order or postpone its execution if the issuer of the order cannot be identified reliably and the know your customer requirements of the legislation in force are not met or the Management Company has not otherwise been provided with sufficient information for executing the redemption.



The following deadlines are complied with in receiving subscriptions and redemptions:

FUND	Assignment received	Execution
Elite Alfred Berg Optimal Allocation	by 2:00 p.m. Finnish Time	on the same day
Elite Alfred Berg Yield	by 2:00 p.m. Finnish Time	on the same day
Elite Alfred Berg Equity	by 2:00 p.m. Finnish Time	on the same day

The Management Company has the right to redeem fund units without the order or consent of the unitholder if the unitholder does not fulfil the requirements for the existence of a customer relationship set by legislation binding on the Management Company or if the existence of the customer relationship unreasonably increases the administrative obligations of the Management Company. The Management Company has the right to unilateral redemption e.g. if the unitholder does not provide or update information absolutely required for fulfilling the Management Company's obligations or the unitholder moves to a state outside the EEA, due to which unreasonably additional administrative burden is caused to the Management Company.

More detailed information about subscriptions, redemptions and changes of fund is provided in the fund rules.

#### Suspending subscriptions and redemptions

The Management Company may temporarily suspend the redemption of fund units if this is specifically required by the interests of the unitholders. The redemption of units can be suspended if the value of the common fund cannot be reliably calculated on a marketplace material to the common fund's investment activities or due to disruptions in communication for which the Management Company cannot have prepared beforehand. In such a situation, the orders are executed using the fund unit value of the following valuation day. The Financial Supervisory Authority is immediately informed of the suspension of redemption of fund units. The unitholders will be informed of such an exceptional situation without undue delay on the Management Company's website, for example.

#### Errors in value calculation

The Fund Management Company keeps a list of errors in value calculation, which the unitholders have the right to review. The Board of Directors of the Fund Management Company has decided that the following thresholds apply to determining the materiality of errors in the calculation of the fund's value:

Category 1: Materiality threshold ≥ 0.5% Elite Alfred Berg Optimal Allocation, Elite Alfred Berg Equity,

Category 2: Materiality threshold ≥ 0.3%

Category 3: Materiality threshold ≥ 0.2%

Elite Alfred Berg Yield

Category 4: Materiality threshold ≥ 0.1%

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# Charges and fees

#### Administrative fee

The Management Company collects an administrative fee in compensation for its activities. The administrative fee can be comprised of a fixed or a fixed and performance- linked component. Performance fees are only charged when the returns of the common fund in question have exceeded the benchmark of the common fund. The administrative fee includes the fee paid to the custodian for the custody of securities and associated tasks.

The Board of Directors of the Management Company confirms the administrative fees for each fund unit series issued. The amount of the administrative fee charged by the Management Company from time to time is specified in the fund prospectus. The fixed and any performance fee are taken into account in the daily value of the fund unit, and it is not separately charged to the fund unitholder.

# Trading fees and transaction fees

Brokerage fees charged by securities brokers and other direct trading expenses and transaction fees charged by the custodian not included in the ordinary custodian service charged as the administrative fee are paid from the assets of the common fund.

#### Other fees

When the common fund invests its assets in common funds managed by another fund management company, the administrative fees of the fund invested in are paid from the assets of the common fund.

#### Fund unit subscription and redemption fees

The Management Company charges a fee for subscriptions and redemptions of fund units, the maximum amount and grounds for determination of which are specified in the fund rules. The subscription fee is charged from the amount paid by the customer to the common fund's account. The redemption fee is charged from the amount redeemed by the customer.

The Board of Directors of the Management Company confirms the subscription and redemption fees for each fund unit series issued. The Management Company has the right to not charge subscription and/or redemption fees separately for each individual subscription or redemption in full or part.

The Board of Directors of the Management Company confirms the service price list in force, based on which the fees charged from time to time are determined. The fees in force at each time are specified in the fund prospectus.

#### **Taxation**

#### Taxation of the fund

A common fund registered in Finland pursuant to the Act on Common Funds is not liable to pay tax on its income in Finland.

Taxation of a unitholder in Finland (natural person subject to general tax liability in Finland)

Capital gains and losses arising from the redemption of fund units and distribution of returns are taxable capital income.



Capital gains are calculated by subtracting the actual initial cost and expenses incurred in the acquisition of income, such as subscription and redemption fees, from the transfer price. Alternatively, a private person can deduct the "deemed acquisition cost" from the transfer price. The deemed acquisition cost of a fund unit held for a minimum of 10 years is 40% of the selling price, for one held for less than 10 years it is 20% of the selling price.

Capital tax is paid on the capital gain at the tax rate in force at each time.

Capital losses can be deducted in taxation on capital income for the tax year and following five tax years. In calculating the capital loss, the subscription and redemption fees charged in conjunction with the subscription and redemption of the fund unit are taken into account. As a rule, changing fund units is treated as redemption and subscription in taxation. In this case, the capital gain or loss arising from redemption is taxable capital income and what is presented above on the taxation of capital gain or loss applies. If the change of fund units concerns fund units of different types in the same fund (such as exchange of fund units between different unit series of the Fund), however, no taxable capital gain or loss arises.

When selling fund units, the acquisition cost of the fund unit sold is primarily determined so that the units first acquired are considered to be sold first (First In, First Out).

The Management Company reports the fund units held by the taxpayer and capital gains and losses incurred during the tax year and distribution of returns to the tax authorities. However, the taxpayer is ultimately liable for the capital gains and losses incurred during the tax year having been reported correctly to the tax authorities.

# Automatic exchange of taxation information

The Management Company is under a statutory obligation to find out the customer's country of residence in taxation and report related information to the Finnish tax authorities. In order to fulfil the reporting obligations, the customer is obliged to provide the Management Company with the information required for determining the country of residence for tax purposes it requests. The duty to provide information may be associated with e.g. the owners and controlling persons of a corporate customer. If the customer is uncertain about their country of residence for tax purposes, the customer is advised to contact an independent tax expert.

#### RISKS ASSOCIATED WITH INVESTING IN A FUND

#### **General**

The Management Company identifies, monitors and manages risks relating to the operations of the Fund in accordance with valid regulations and the principles confirmed by the Board of Directors of the Management Company. The information below about the most common financial instruments and their risks is not exhaustive.

Investing in a fund always involves risk. The value of fund investments can increase or decrease. When the value decreases, the investor can lose part or all of the assets invested. There is no guarantee of the investment objective being reached, especially in the short term. The value development of a fund can deviate from the benchmark index and other corresponding funds.

Before making the decision to invest, the investor has to carefully review the materials concerning the financial instrument, such as fund prospectus, key investor information document and rules, in order to understand the risks associated with the financial instrument and any effects on the investor's financial position.



# **Key risks**

# Force Majeure

Risk of a significant impediment beyond the control of the Management Company and the counterparties to investment activities to the continuity of the Fund's operations. Examples of such obstacles include natural disaster, pandemic, strike, insurrection, coup d'état, war or other armed conflict.

## Commodity market risk

Risk related to the general development in the commodity market and development of the value of an individual commodity. The return on commodity market investments may fluctuate strongly as the market situation changes.

#### Inflation risk

It is possible that returns on short-term investments do not develop at the same rate with inflation, which decreases the investor's purchase power.

#### Derivatives risk

Derivative instruments can be used for covering risks (hedging) or optimising returns on investments (trading) in accordance with the rules of the fund. Derivative instruments often involve the leverage effect, which can increase the volatility of the fund.

# Emerging markets risk

Funds that invest in emerging markets are prone to above-average volatility because their operations are highly centralised, uncertainty factors increase with little information being available, cash assets are lower or they are more exposed to changes in the markets (social, political and economic situation).

#### Interest rate risk

Fixed-income investments are associated with the interest rate risk, which is the risk connected to the general development of market interest rates. The value of fixed-income interests primarily decreases when market interest rates increase and increases when market interest rates decrease.

#### Liquidity risk

A risk relating to the solvency of counterparties or market disruption, i.e. the risk that converting assets included in the fund's investments is delayed due to a disruption in the counterparties' solvency or the marketplace.

# Credit risk

Risk associated with the counterparty's solvency, i.e. risk of the conversion of assets included in the fund's investments into cash fails completely or partly due to the counterparty's insolvency.

#### Geographical risk

The economic development of a single geographical area can differ considerably from the general development of the world economy. Therefore, the development of the value of the



Fund's investments in a single geographical area may differ from the general development of the international market.

# Operational risk

Operational risk refers to the risk of losses relating to the fund due to insufficient or incorrect internal procedures or faults relating to personnel or systems as well as external events. Operational risk also encompasses legal risk and data security risk.

## Equity market risk

Equity market investments are associated with equity market risk, which is the risk connected to the general development of the equity market. The return on equity market investments may fluctuate strongly as the market situation changes.

### Risk related to small enterprises

Small enterprises might be unable to source new funds for guaranteeing their growth and development, and might not be able to develop products for new and uncertain markets. Also, the liquidity of shares in small enterprises is generally weaker.

#### Political risk

Risk of changes in economic policy and the political environment in an area in which the Fund's assets are directly or indirectly invested having an effect on the value of the Fund's investments.

#### Settlement risk

Risk that the trading counterparty fails to meet the contract terms even if the other party has met its own obligations. The settlement risk is realised as a delay in the settlement of a security transaction.

#### Custodian-related risk

The storage of the fund's assets and retention of their value, especially abroad, involves risks that may arise from the custodian's liquidation or negligent or fraudulent acts.

#### Sectoral risk

The economic development of a single single sector can differ considerably from the general development of the economy. Therefore, the development of the value of the Fund's investments in a single sector may differ from the general development of the market.

# Currency risk

Investments not denominated in the Fund's base currency (euro) involve currency risk, which is a risk associated with fluctuations in exchange rates. The value of the Fund's assets is determined in the base currency of the Fund, and fluctuations in the exchange rates affect the value of investments not denominated in the base currency when converted to the base currency.

# Counterparty risk

Counterparty risk concerns the counterparties used by the Fund (in e.g. deposits and trading in derivative instruments) and their ability to comply with their commitments (e.g. payment, delivery, refund).



#### Tax risk

The value of investments can be affected by the different tax legislation of different countries, including tax at source or the economic and monetary policy of the countries concerned.

#### **OTHER INFORMATION**

### Financial year

The financial year of the common fund and the Management Company is the calendar year. The financial year can deviate from this at the start or end of the Fund's operations. The duration of a deviating financial year may be a maximum of 18 months. The fund prospectus, half-year reviews and annual report of the common fund are published as mentioned in the Act on Common Funds. The annual report is available from the Management Company within three months and the half-year review within two months of the end of the accounting period in accordance with the rules of the fund. The closing date of the financial statements is 31 December.

# Amending the rules of the common fund

The Board of Directors of the Management Company decides on amending the rules of the common fund. The amendment to the rules of the common fund enters into force within one month of the amendment to the rules approved by the Financial Supervisory Authority has been made known to the unitholders as mentioned in the rules.

## Unitholder meeting

The Management Company will not arrange regular meetings of unitholders. A unitholder meeting must be arranged when the Board of Directors of the Management Company considers it necessary or if the auditors, an independent member of the Board of Directors or unitholders together representing a minimum of 5% of all issued units demand it in writing for processing a specific matter. The unitholder meeting is convened by the Board of Directors of the Management Company as mentioned in the rules.

The Board of Directors of the Management Company must inform the unitholders of a proposal to convene a meeting referred to in Chapter 26, section 9 of the Act on Common funds in accordance with article 14 § of the rules or another meeting proposal of a unitholder, unless the unitholder proposing the meeting to be convened has the minority holding mentioned above. For a justified reason, the Management Company can refuse to announce a meeting or arrange one if it considers arranging a meeting unfounded. The Management Company shall inform the unitholder that proposed the meeting to be convened of its refusal and its grounds.

The Board of Directors of the Management Company shall immediately convene a meeting if unitholders together representing a minimum of 5% of all issued units demand it in writing.

Unitholders that have registered to the Management Company on the last registration date mentioned in the notice of the meeting at the latest shall have the right to attend the general meeting of unitholders. The unitholders do not have the right to exercise the rights belonging to a unitholder at a meeting before their fund unit has been registered or they have presented their title and an account of it to the Management Company.

Each unit in the common fund conveys one (1) vote at a general meeting of unitholders. If the entire holding of a unitholder in the common fund is less than one full unit, the unitholder



shall have one vote at the meeting. A unitholder does not have the right to exercise the rights belonging to a unitholder at a meeting before their fund unit has been registered.

# Reporting

The up-to-date development of the value of the common fund and daily values of the fund units are published on the Management Company's website.

The fund unit subscription and redemption calculations and holding reports are available on an online service.

# Important notifications and bulletins

The legislation in force is complied with in statutory communications. Other important notifications and bulletins will be published on the Management Company's website, unless otherwise mentioned in the rules of the fund. The Management Company may, at its discretion, also make other important notifications available to the fund unit holders in another way agreed upon with the unitholders.

#### **Contact information**

Evli Fund Management Company Ltd

Aleksanterinkatu 19, 4th floor PB 1081 00101 Helsinki Investor service +358 9 4766 9701, Mon to Fri 9.30 AM – 16.30 PM



# Important information for US investors

The Management Company does not have a licence for offering services in the United States, and the Management Company or the common funds managed by it have not been registered in accordance with the Securities Act of 1933 or the Investment Company Act of 1940. Therefore, the Management Company cannot offer services to (i) natural persons or entities located in the United States, (ii) companies and entities governed by the laws of the United States or (iii) any other person who is considered a US Person.

# Information relating to US investors

The Management Company is not registered in the United States as an investment adviser. The Fund is not registered as an investment vehicle in the United States and its units are not and will not be registered pursuant to the Securities Act of 1933; consequently, they may not be offered or sold in the United States to the Restricted Persons defined below.

Restricted Persons are: (i) any person or entity located in the territory of the United States (including US residents), (ii) any company or other entity governed by the laws of the United States or one of its States, (iii) all United States military personnel or any employee linked to a US department or government agency located outside of the territory of the United States, or (iv) any other person who is considered a US Person pursuant to Regulation S of the Securities Act of 1933, as amended.

The Fund will not accept any subscriptions from investors that are employee benefit plans or entities whose assets constitute employee benefit plan assets whether subject or not to the United States Employee Retirement Income Securities Act of 1974, as amended.