



# wip WATER FUND

**Prospectus**

**WIP Water Fund AIF**

**1.3.2022**

**NON-BINDING TRANSLATION**

**This is a direct translation of the Finnish text of the Fund Prospectus of the Fund. The translation has been prepared with care and diligence. In the event of any inconsistency or ambiguity in relation to the meaning of any word or phrase in any translation, the Finnish language versions of the fund rules and Prospectus remain the only legally binding documents.**

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# 1 Important information

## 1.1 General

This is the fund prospectus of WIP Water Fund AIF in accordance with the applicable legislation (hereinafter the “Fund”). The portfolio manager and distributor of the Fund is WIP Asset Management Ltd (hereinafter also the “Portfolio Manager”). The Fund is managed by GRIT Fund Management Company Ltd (the “AIFM”). The prospectuses of other funds managed by the AIFM are published separately. The Fund may be marketed to both professional and non-professional investors.

This prospectus is not addressed or intended for non-professional investors outside Finland. The Fund is not open to investment by or on behalf of a U.S. person, regardless of his or her place of residence. Marketing the Fund in a country where it is not registered or otherwise notified for marketing is prohibited. The AIFM is not responsible for the distribution of this Prospectus to persons, to whom it is not permitted to offer the Fund and its fund units according to the law of their domicile. Investors subscribing to fund units should verify the requirements applicable to the purchase, sale and other transactions of fund units, the applicable foreign exchange trade regulations and the tax consequences of the transactions in their home country. It is possible that foreign investors may not invest in the Fund under the laws of a particular country. The AIFM takes no responsibility for whether foreign investments are made in accordance with the laws of that country.

Disagreements in relation to the Fund or the information on the Fund are settled in accordance with Finnish law and exclusively in Finnish courts, unless otherwise stated in this prospectus. The annual and semi-annual reports of the Fund are available free of charge from the AIFM or the Portfolio Manager. If the content of the prospectus and the fund rules do not correspond to each other, the content and wording of the fund rules shall prevail and thus be decisive. If the content of the different language versions of the fund documentation does not correspond to each other, the Finnish language documentation shall prevail and be decisive.

The Portfolio Manager, the AIFM and the depositary have the right to record phone calls. By making a call, the counterparty is deemed to have given its consent to record the communications between the counterparty and the Portfolio Manager, the AIFM or the depositary and that the Portfolio Manager, the AIFM and/or the depositary, when necessary have the right to use the recordings to resolve disputes.

## 1.2 Supervisory authority

Finnish Financial Supervisory Authority  
Snellmaninkatu 6, P.O. BOX 103, FI-00101 Helsinki, Finland  
Telephone (switchboard): +358 9 183 51  
Fax (registry): +358 9 183 5328

## 2 WIP Water Fund AIF

### 2.1 Information of the fund

The Fund is a Finnish non-UCITS fund in accordance with Chapter 16 a of the Finnish Act on Alternative Investment Fund Managers and an alternative investment fund within the meaning of the law.

The recommended investment period is at least five (5) years.

<b>Name of the Fund</b>	WIP Water Fund AIF
<b>Liquidity</b>	Weekly*
<b>Launch date</b>	1.10.2020
<b>Latest date of approval of the fund rules</b>	29.11.2019
<b>Annual report and semi-annual report</b>	Available free of charge from the Portfolio Manager or the AIFM
<b>Value development</b>	Available free of charge from the Portfolio Manager or the AIFM
<b>Date of financial statement</b>	31.12. The first accounting period is deviating and ends 31.12.2021.
<b>Auditor</b>	KHT Kristina Sandin Deputy auditor: Auditing firm Ernst & Young Ltd
<b>Description of arrangements for managing the Fund's liquidity risks</b>	<p>The Fund may invest its assets mainly in instruments that can be considered to have sufficient liquidity in relation to the Fund's own regulations on when the Fund is open for subscriptions and redemptions. The Fund's investment activities are also subject to the investment restrictions set out in Article 7 in the fund rules and the limits arising from the risk management principles, which form an integral part of liquidity risk management. In addition, the fund must have sufficient cash resources to operate.</p> <p>The AIFM may limit redemptions on its own initiative in order to manage the Fund's liquidity and to protect smaller unit holders by staggering redemptions over several redemption days in the manner specified in the fund rules and if certain conditions are met.</p>

\* as defined in section 2.4.

### 2.2 Investment strategy and responsibility

The Portfolio Manager is responsible for the portfolio management of the Fund on a delegate basis. The Portfolio Manager, the AIFM and the Fund are supervised by the Finnish Financial Supervisory Authority.

The Fund is an actively managed thematic ESG fund. The Fund invests globally and selectively in companies in the water industry whose principal business is based on water-related activities such as water infrastructure or water technology emphasizing sustainable companies.

The Fund's investment theme includes companies included in the S&P Global Water Index and / or the Nasdaq OMX Global Water Index. The majority of the Fund's holdings are in globally listed equities. The selection of these emphasizes large and medium-sized, stable quality companies. The Fund may also invest in unlisted Nordic companies, as appropriate, thus distinguishing the Fund from traditional equity funds. These investments are aimed at a sharper water strategy and higher return potential than listed companies.

The environmental and social impacts of investment targets and governance are taken into account in the investment decisions in accordance with the Portfolio Manager's ESG strategy. Among other things, the selection of investment targets favors responsibly managed companies within the Fund's water theme and excludes companies that do not meet the ESG requirements set by the Portfolio Manager based on the Portfolio Manager's responsibility assessment. Companies that make a significant part of their turnover in unethical or environmentally harmful sectors, such as gambling, tobacco, alcohol, fossil fuels, nuclear power and weapons, are also avoided as an investment. The minimum requirement for responsibility is that the investee companies comply not only with legislation but also with international standards, such as the UN Declarations on human rights and sustainable development.

As part of the analysis and evaluation of investment targets, the Portfolio Manager monitors the financial performance, strategy, future opportunities and challenges, and responsibility of the companies as a whole. The monitoring utilizes, among other things, the communications generated by the companies, external and Portfolio Manager's own analyzes, as well as dialogues with the management and other stakeholders of the companies. The exercise of ownership rights is part of the Fund's responsible investments and it also aims to influence the companies in which it invests.

More detailed information on the Portfolio Manager's ESG strategy and ownership policy is available on the website [www.wip.fi](http://www.wip.fi). The principles of responsible investment applicable to the fund's investment activities are also available on the fund specific page at [www.gritfundservices.fi/wip](http://www.gritfundservices.fi/wip).

## 2.3 Unit series

The fund is offered to investors in two unit series.

Unit series	I unit	A unit
Minimum subscription (EUR)	2 500 000	1 000
Subscription fee	0%	0%
Redemption fee	0%	0%
Management fee* <sup>1</sup>	0,9% p.a.	0.9% p.a.
Performance fee* <sup>2</sup>	12%	15%
ISIN	FI4000411350	FI4000411368
Currency	EUR	EUR
Type of units	Growth	Growth

\*<sup>1</sup> Includes the fees to the Portfolio Manager and the AIFM.

\*2 The High Watermark principle is used to calculate the performance fee. The performance fee is charged on the part of return of the Fund unit that exceeds 6% of the annual return.

Further information on the costs and charges related to the fund shares can be obtained by telephone from the Portfolio Manager.

## 2.4 Subscription and redemption

The subscriber of the fund units must notify his or her intention to subscribe or redeem fund units in writing to the AIFM or the Portfolio Manager.

### Contact details of the recipients of the orders

#### WIP Asset Management Ltd

Address: Mannerheimintie 18 A, FI-00100 Helsinki

Email: backoffice@wip.fi

#### GRIT Fund Management Company Ltd

Address: Pitkätatu 34C, FI-65100 Vaasa

Email: fundadmin@gritfundservices.fi

<b>Subscription amount and order</b>	The banking day preceding the subscription day by 23:59
<b>Subscription day</b>	Last banking day of each week
<b>Redemption order</b>	The banking day preceding redemption day by 23:59
<b>Redemption day</b>	Last banking day of each week
<b>Redemption payment</b>	Within five (5) banking days from publication of the value
<b>Subscription account (IBAN)</b>	FI13 1318 3000 1081 41

### Subscription of fund units

An investor wishing to subscribe fund units may place a written subscription order by submitting a completed subscription form including attachments to WIP Asset Management or to the AIFM either by post or e-mail before the intended subscription date. Moreover, the investor shall transfer the whole subscription amount to the subscription account of the Fund. The subscription order must be with the AIFM and the subscription amount on the Fund's bank account no later than 23.59 o'clock on the banking day preceding the subscription date.

The AIFM decides on the minimum subscription amounts set out in section 2.3 of this prospectus.

The subscription order is considered received when the AIFM has received the subscription order and the funds related to the subscription are available to the AIFM on the Fund's bank account. A subscription order received after the cut-off is executed on the following subscription day.

### Transfer of unit class

Should the value of a fund unit holder's total investment in a unit series of the Fund exceed the limit of minimum subscription in other unit series of the Fund and all other conditions of the other fund unit series are met, the AIFM will, at the written request of the fund unit holder, transfer the fund unit holder's holdings to the unit series, which minimum subscription amount the holding exceeds at the time of transfer. The written request of the transfer must be with the AIFM no later than 23.59 o'clock on the banking day preceding the transfer date. The transfer request will be executed on the following subscription day. If the transfer order is received after the cut-off, it is executed on the following subscription and redemption day.

Should the value of a fund unit holder's total investment in the Fund as a result of a redemption decrease during the investment period, the AIFM is entitled to transfer the holding to the fund unit series to which the total holding of the fund unit holder in question at the time of transfer entitles.

### **Special investor groups**

The following groups are seen as one investor when applying the minimum subscription amounts and hence every member of the mentioned group is entitled to, at subscription of fund units, subscribe fund units of the unit series to which the group's total investment entitle:

- 1) the fund unit holder's family (spouses and relatives mentioned in Chapter 2 of the Finnish Code of Inheritance and their spouses); and
- 2) the fund unit holders' company and its partners.

Persons employed by Fund's Portfolio Manager or an affiliated company therewith, and their families (relatives mentioned in Chapter 2 of the Finnish Code of Inheritance and their spouses) have the right to subscribe for fund units diverging from the minimum subscription amounts specified in the Fund's prospectus. Deviations from the minimum subscription amounts specified in the Prospectus may also be made for investors or groups of investors, which total customer relationship is significant for the Portfolio Manager's group, provided that the deviation from the minimum subscription limit do not endanger the equality of the investors.

The term spouse includes in addition to married persons, also persons living in a marriage-like relationship in the same household on a permanent basis and persons in registered partnerships.

To receive the benefit in question, the investor shall in writing prove its membership in one of the groups. Received benefits can be cancelled only in cases of evident abuse. However, an investor belonging to a special group may be transferred to another unit class if the circumstance on which his membership is based no longer applies.

### **Redemption of fund units**

An investor wishing to redeem fund units may place a written redemption order by submitting a completed redemption form to WIP Asset Management or to the AIFM before the intended redemption date. The redemption order must be with the AIFM no later than 23.59 o'clock on the banking day preceding the redemption date. A redemption order received after the cut-off is executed on the following redemption day. A redemption order may only be cancelled with the approval of the AIFM. The redemption price is determined by the value on the redemption day.

The Financial Supervisory Authority may, for a special reason, if the interests of the unit holders so require, authorize the AIFM to temporarily suspend the issue of the Fund's fund units.

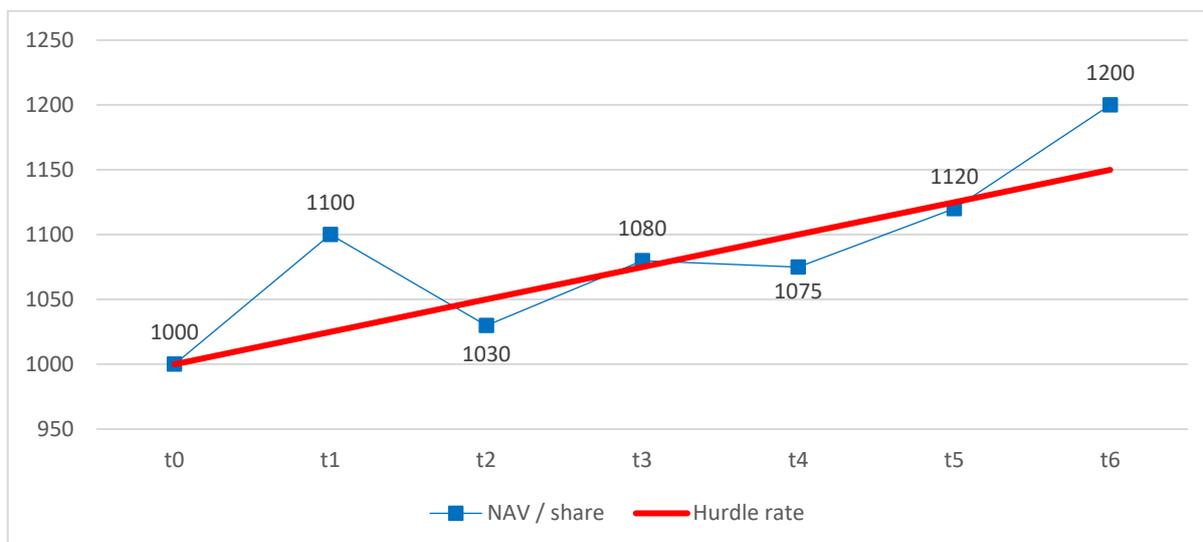
In addition, the AIFM has the right to redeem fund units in the situations specified in the rules without the unit holder's order or consent, if the unit holder does not meet the statutory obligations applicable to the AIFM or the continuation of the client relationship would unreasonably increase the administrative obligations of the AIFM. In addition, the AIFM may unilaterally redeem the investor's fund units, e.g. if the unit holder fails to provide or update the information necessary to fulfill the AIFM's statutory obligations or, for example, the unit holder moves to a non-EEA country, resulting in unreasonable additional administrative obligations for the AIFM.

The AIFM may also limit redemptions on its own initiative in order to manage the Fund's liquidity and to protect smaller unit holders by splitting redemptions over several redemption days in the manner specified in the fund rules and if certain conditions are met.

## 2.5 Expenses

The Fund's performance is reduced by various fees and expenses. Subscription and redemption fees are charged in accordance with the table in section 2.3.

In order for a performance fee to be charged, the return of the Fund must be positive in relation to the Hurdle rate (fee threshold) and the value of the fund unit must exceed its High Watermark (historically highest value). The performance fee is charged on the part of the value of the fund unit that exceeds an annual Hurdle rate of 6 % and the latest High Watermark level (together the “High Watermark-value”), which the AIFM and the Portfolio Manager deem to create appropriate incentives to generate long-term capital growth in accordance with the Fund’s investment strategy. The performance fee is invoiced monthly in arrears. The amount of the performance fee is calculated from the increase in the value of the fund unit after deducting all other expenses. The return paid to the distributing fund units is added to the value of the distributing fund units when calculating the amount of the performance fee. At each calculation interval, the initial value of each calculation shall be the highest published value of the fund unit since the inception of the Fund. If the new value of the fund unit does not exceed the specified initial value at the time of calculation, no performance fee will be charged.



Time period	Fund NAV/share	Hurdle rate	Performance fee payable
t0	1000	1000	No
t1	1100	1025	Yes
t2	1030	1050	No
t3	1080	1075	No
t4	1075	1100	No
t5	1120	1125	No
t6	1200	1150	Yes

The graph above describes a hypothetical example of how the performance fee would be realized if the performance of the Fund (blue line), High Watermark value and Hurdle rate (red line) would

correspond with the example above. In the example, the value of the Fund increases from t0 to t1. Thus, a performance fee is realized for this part since the performance of the Fund exceeds its High Watermark-value. The performance of the Fund is negative in both t2 and t4, resulting in no performance fee being realized. A performance fee may further not be realized in t3, since the value in t3 does not exceed the historically highest value that was achieved in t1. In t5, a performance fee is not being realized, because the value of the Fund is below the Hurdle rate level. The value of the Fund is above both the High Watermark-value and the Hurdle rate level in t6, whereupon a performance fee is realized on the positive return since the latest High Watermark-value was achieved.

All other costs, expenses, charges and fees that are essential for the operation, administration, financing, custody, sub-custody, business or the investments of the Fund are charged from the Fund's assets. Such costs are for instance the Fund's trading and banking expenses, research fees, costs in relation to use of third-party services, auditing costs, fees by authorities and statutory reporting expenses. These costs are evenly distributed in proportion to the holdings of the unit-holders, and their amount is affected by e.g. the investment activity and the size of the Fund.

Expenses arising from the operations of the Fund shall be paid from the assets of the Fund in accordance with the fund rules and this Prospectus.

## 2.6 Calculation and publication of the value of the fund units

The AIFM calculates the value of the fund units every banking day and the value of the fund units is published no later than one week after the valuation day. The value is available from the AIFM and the Portfolio Manager.

The value of the Fund is calculated and published in euro. The valuation principles set forth in the Fund rules will be applied in the calculation.

An annual and semi-annual report of the Fund are prepared, and they are available to the fund unit holders from the AIFM or the Portfolio Manager free of charge. Also the historical performance of the Fund is available from the AIFM or the Portfolio Manager.

The limit for a significant error in the calculation of the value of the Fund is  $\geq 0,5\%$  of the Fund's value. The AIFM maintains a list of all valuation errors. A list of significant errors may be obtained free of charge from the AIFM. In case the limit of a significant error is breached, measures are undertaken in accordance with the procedures set out by the Finnish Financial Supervisory Authority and the AIFM.

## 3 Management

### 3.1 Portfolio Manager

The AIFM has delegated the portfolio management of the Fund to WIP Asset Management. The Portfolio Manager is independently responsible for the portfolio management of the Fund in accordance with this Prospectus.

<b>Name</b>	WIP Asset Management Oy
<b>Established</b>	20.12.1995

<b>Business ID</b>	1029199-9
<b>Home state</b>	Finland
<b>Domicile</b>	Helsinki
<b>Postal and visiting address</b>	Mannerheimintie 18 A, FI-00100 Helsinki
<b>License(s)</b>	Portfolio management, investment advice, execution of orders and transmission of orders

### 3.2 AIFM

<b>Name of the AIFM</b>	GRIT Fund Management Company
<b>Established</b>	22.4.2004
<b>Business ID</b>	1830022-0
<b>Share capital</b>	275 334 euros (The requirement of sufficient additional funds set forth by chapter 6, section 4 of the Finnish Act on Alternative Investment Fund Managers (162/2014) is covered with own capital)
<b>Home state</b>	Finland
<b>Domicile</b>	Helsinki
<b>Administrative headquarters</b>	Vaasa
<b>Postal &amp; visiting address</b>	Pitkätatu 34 C, FI-65100 Vaasa
<b>Business activities</b>	Investment fund activities and activities essentially related thereto Alternative investment fund manager
<b>License(s)</b>	Licensed fund management company and licensed alternative investment fund manager (AIFM)
<b>Members of the board of directors</b>	Daniel Djupsjöbacka Per-Johan West Anders Kulp* * Independent board member
<b>CEO</b>	Per-Johan West
<b>Auditor</b>	KHT Kristina Sandin Deputy auditor: Auditing firm Ernst & Young Oy

### 3.3 Depositary

<b>Name of the depositary</b>	Skandinaviska Enskilda Banken AB (publ), Helsinki branch
<b>Line of business</b>	Banking
<b>Place of business of the branch</b>	Helsinki, Finland
<b>Domicile</b>	Stockholm, Sweden

The depositary is responsible for the safekeeping of the Fund's assets and for ensuring that the Fund's and the AIFM's operations comply with the law, the Fund's rules and provisions by competent authorities, and for performing other tasks in accordance with the Act on Common Funds and the

Alternative Fund Managers Act. The depositary performs the duties assigned to it by law independently. The assets of the Fund are kept separate from the assets of the AIFM, other funds and the depositary. The Fund's assets may not be used to cover the debts of the depositary or the AIFM.

## 4 Risks

All investment activities contain risks. It cannot be guaranteed that an investment in the Fund would generate a positive return, even if the general development of the capital markets would be positive. There are no guarantees that an investment in the Fund would not result in a loss. The values of the invested capital may increase and decrease, and there are no guarantees that the invested capital will be retained in full. Any profit margin goals set for the Fund do not guarantee the performance of the Fund in the future. There is no capital guarantee on the investment and there is a risk of losing the invested capital. Past performance is not indicative of future results. Investments made in the Fund shall be considered long-term investments.

### 4.1 Risk management

The AIFM is responsible for the risk management of the Fund. The Fund invests primarily in investments with sufficient liquidity to ensure the Fund's own liquidity. In addition, the ratio between the investment objects and the liquidity of the Fund is designed so that the Portfolio Manager can execute the necessary redemption orders and asset sales in order to execute redemptions by the fund unit holders. The risk management of the Fund is based on sufficient diversification.

The risk management of the Portfolio Manager is primarily based on careful target selection and analysis prior to the investment decision, in which the investments are reviewed both on a stand-alone basis and as part of the portfolio. The Portfolio Manager also evaluates and monitors e.g. the estimated liquidity of the portfolio, currency risk and market developments. In the risk management, both the Portfolio Manager and the AIFM actively monitor the allocation of investments made by the Fund and the development of risk weights, as well as the liquidity effects of subscriptions and redemptions. The measures are intended to ensure sufficient liquidity and diversification for the Fund, but any corrective actions will be executed by taking into account the market and price situation.

In addition, the Portfolio Manager and the AIFM evaluate the Fund's risk classification annually together i.a. in accordance with the SRRI risk measure, and always disclose the updated level of risk in the key investor information document.

### 4.2 Main risks in brief

<b>Equity risk</b>	A Fund that invests in the equity market is always exposed to equity risk, which is a risk related to the general development of the equity market. Share prices may rise or fall due to the general economic situation or changes in the individual company. The value of the Fund can fluctuate strongly in short and long term.
<b>Style and industry risk</b>	The fund's investment style (ESG) may affect the fund's performance. The fund also invests in companies in a certain industry within the framework of

the ESG investment style, and thus the distribution of investments and their value development may differ significantly from the broad stock market.

**Currency risk**

The Fund may also place its assets in investments located outside the euro area, whereby the Fund would be exposed to risks associated with changes in exchange rates. The value of the Fund's assets is determined in the base currency of the Fund, and changes in exchange rates affect the value of investments denominated in currencies other than the base currency.

**Liquidity risk**

The risk of not being able to liquidate the investments of the fund within the planned timeframe or at an aspired price. Liquidity risk applies in particular to investments in unlisted companies, from which the possibility of exiting the investment may be limited.

**Market risk**

Market risk refers to the risk caused by fluctuation in the market value. Market risk may be independent or linked to the general development of the stock market. The stock market or the value of the fund may be affected by e.g. the interest rates or fluctuations in the exchange rates.

**Operational risk**

An operational risk is a risk caused by deficiencies in operational processes, personnel or IT systems. Operational risks are handled with sound internal policies and external practices where one strives to take all relevant risks into account and to minimize potential losses thereof.

**Counterparty risk**

The risk that the Fund's counterparty on the securities market is unable to meet its agreed obligations. A counterparty risk may arise e.g. in connection with the clearing of securities or other financial instruments, if the counterparty does not act in accordance with the agreed terms. In respect of custody matters, a counterparty risk may arise, if the assets held in custody are entirely or partially lost due to e.g. negligence or willful misconduct or any other reason.

**Risks related to extraordinary circumstances**

Risks related to extraordinary circumstances are often risks that are challenging to take into account and that derive from unexpected external circumstances such as e.g. political events, natural catastrophes, riots and industrial actions. This risk is usually higher when the Fund trades internationally in different trading environments. The risk related to extraordinary circumstances may be reduced by operating in a low-risk environment and by appropriate diversification. The materialization of such a risk may affect the value of the fund units.

**Other risks**

The management of the Fund might involve risks that have not been identified. Unidentified risks may affect the performance and net asset value of the Fund. All investment activity contains a risk of losing the invested capital.

## 5 Other information

### 5.1 Conflict of Interest

The business of the AIFM comprises the management of investment funds. In connection thereto, situations may arise in which the interests of two parties are in conflict. Such situation may arise e.g. between two investors, the AIFM and a company in the same company group and/or its employees.

The AIFM has established certain written guidelines and has taken structural and administrative actions to mitigate the recognized conflicts of interest. Regarding the portfolio management, the AIFM has ensured that the Portfolio Manager has sufficient internal procedures and organizational structures in place for the management of conflicts of interest. In particular, the AIFM has ensured that the Portfolio Manager does not engage in competitive trading with the investment strategy for its own account, that its own risk management function is functionally and hierarchically separate from portfolio management and that the Portfolio Manager applies appropriate remuneration arrangements that prevent excessive risk-taking.

Despite the pre-emptive measures taken by the AIFM, conflicts of interest may arise. In such a case, the AIFM will inform the relevant parties thereof and take such actions that are necessary and reasonable to remove the conflict of interest. Additional information on the management of conflicts of interest is available from the AIFM.

### 5.2 Taxation of the Fund

According to Finnish law, the Fund is not obliged to pay income tax and it does not pay any tax on capital gain or interest rate income.

### 5.3 Taxation of the investors

All growth units issued by the Fund are fund units whose return is capitalized and for which capital income tax is paid at the time of redemption in accordance with the applicable capital income tax rate.

If the Fund has distribution units, the distribution of the Fund's distribution units is based on the return on the Fund's investments, however, taking into account changes in the Fund's total capital. Investors should be aware that distribution units differ from growth units, for example in terms of unit holder taxation. The AIFM collects a withholding tax on natural persons and domestic estates from the annual distribution. A withholding tax is charged on distribution paid to a unit holder whose tax domicile is not in Finland (limited taxable person) in accordance with the relevant regulations.

The AIFM does not deduct withholding of tax from the appreciation of the fund units at the time of redemption. A fund unit holder must notify capital gains, which they have received as a result of the redemption of fund units in their fiscal declaration or in their tax proposals.

The AIFM reports information regarding the investors' holdings, redemptions and information required to calculate proceeds and losses of sales to tax authorities. The taxpayer shall check their profits and losses of sales, profit distribution and ownership information in their pre-filled tax return.

The taxation of returns received by an individual investor depends on the applicable tax laws based on the investor's tax status and/or country of location. Investors are asked to contact the tax authorities in their hometown or country of location in order to clarify possible tax related questions.

Further information on taxation in Finland and the applicable tax rates is available on the web pages [www.vero.fi](http://www.vero.fi).

#### 5.4 Use of third-party services

The AIFM may use agents in accordance with the fund rules. The AIFM has outsourced the Fund's portfolio management to WIP Asset Management Ltd, which also handles the Fund's sales and marketing.

#### 5.5 Preferential treatment of investors

The AIFM must treat fund unit holders equally. The treatment of investors may differ, for example, in the case of different types of units of the same fund, provided that the special treatment is fair to investors and respects the principle of equality. The special treatment of investors with regard to fund subscriptions is set out in the fund rules.

#### 5.6 Ownership policy

The AIFM does not aim to exercise an active ownership policy. If the Fund's assets are invested in a manner that gives the AIFM the possibility to exercise ownership rights, it merely aims at ensuring the best financial interest of the Fund and its fund unit holders. As part of the ownership policy, the AIFM ensures the receipt of necessary information on the Fund's investments. In principle, the AIFM exercises the voting rights based on the holdings of the funds it manages only if the exercise of the voting rights is considered justified in order to safeguard the interests of the unit holders of the funds managed by the AIFM.

For the Fund described in this prospectus, the AIFM has outsourced the portfolio management of the Fund to WIP Asset Management. The exercise of ownership rights is carried out in a manner more specifically agreed with the Fund's Portfolio Manager in accordance with the Portfolio Manager's ownership policy. Ownership policy is part of the Fund's responsible investment, as described in more detail in section 3.2.

More detailed information on the Portfolio Manager's ownership policy is available at [www.wip.fi](http://www.wip.fi).

#### 5.7 Data protection

The AIFM processes personal data mainly to provide investment fund services and to manage its client relations on a contractual basis. The processing of personal data is also necessary to comply with the regulatory requirements applicable to the AIFM. The AIFM also process personal data for these

purposes in cooperation with the Portfolio Manager. Personal data is processed according to the applicable laws. Before subscribing to a fund, the client is recommended to familiarize itself with the data protection policy available online on the company's website at [www.gritfundservices.fi](http://www.gritfundservices.fi). It contains further information on how the AIFM process personal data of its clients, what rights the data subjects have and how they can exercise their rights. In case the client has any questions about data protection regarding fund investments, the questions and requests can be addressed to the AIFM by email at [privacy@gritfundservices.fi](mailto:privacy@gritfundservices.fi).

The Portfolio Manager also processes personal data in accordance with the regulatory requirements. The Portfolio Manager ensures privacy protection and the obligation to maintain secrecy when processing personal data. The Portfolio Managers data protection practice is stated in their data protection policy available online on the website [www.wip.fi](http://www.wip.fi). For more information on the Portfolio Manager's privacy policy, please contact [backoffice@wip.fi](mailto:backoffice@wip.fi).

## 5.8 Distance selling

This information is given in accordance with Chapter 6a of the Finnish Consumer Protection Act (38/1978). When a consumer enters into an agreement regarding financial services through distance selling, meaning by phone, e-mail or other method that constitutes distance selling, the consumer has in some certain cases the right to cancel the agreement. However, the cancellation right does not concern agreements related to funds. Such fund related agreements are for example subscriptions, transfers redemptions of fund units and change of fund unit series. The customer may of course, redeem its fund units in accordance with the rules of the Fund and the procedure described in the prospectus.

## 5.9 Dispute resolution

The AIFM is the primary contact in any questions regarding fund investments. If there is a disagreement regarding a fund investment between the AIFM and the customer, which they cannot be settled by mutual negotiations, the customer may (instead of a court) submit the case to the Finnish Investments Complaints Board.

The Finnish Investments Complaints Board  
Porkkalankatu 1, FI-00180 Helsinki, Finland

## 5.10 Remuneration policy

The remuneration policy applies to such personnel groups in the AIFM that significantly through their professional activity significantly affect the risk profile of the company or investment funds managed by the company. These personnel groups include for instance, the management of the company and the persons whose tasks require risk taking. The remuneration policy applies to all payments and benefits made against professional work, e.g. to the members of the personnel groups. More specified and detailed information about the company's remuneration policy is available on the AIFM's web pages [www.gritfundservices.fi](http://www.gritfundservices.fi).

## 5.11 Sustainability-related disclosures

### 5.11.1 Sustainability risks

The Fund and its assets are exposed to sustainability risks. The financial position of investments in the Fund may deteriorate due to ESG-related risks. Failing to mitigate against the consequences of climate change could potentially have an impact in the underlying assets. Therefore, the Portfolio Manager has identified the principal adverse impacts and sustainability risks of our investment decisions and take these into account along with the financial aspects when making investment decisions.

### 5.11.2 Adverse sustainability impacts

The Portfolio Manager performs a comprehensive analysis of the target companies, their revenue sources and industries before making an investment decision. The Portfolio Manager considers adverse sustainability impacts and other ESG-aspects, e.g. what sustainable development goals (SDG) the target company is aiming for. When analyzing company specific risks of the target investment, the Portfolio Manager takes adverse sustainability impacts into account as a part of the broader picture and monitors these in addition to economic analyses and figures. These are being continuously monitored both before and after the investment decision. The Portfolio Manager supports its responsibility assessment with third-party ESG analyses and classifications. The Portfolio Manager also collects its own ESG data e.g. in connection with meetings with the company. If the Portfolio Manager notices that the target company deviates significantly from previously communicated figures (increasing adverse sustainability impacts), the Portfolio Manager will investigate the issue further and consider appropriate measures, such as exclusion from the investment universe.

The Portfolio Manager excludes and refrains from investing in companies that generate a significant share of their turnover from unethical or environmentally harmful industries. The Portfolio Manager has excluded producers of tobacco, cannabis, adult entertainment, gambling and weapons banned by international treaties (e.g. nuclear weapons, land mines, cluster weapons and chemical and biological weapons) from its direct investment universe. In addition, the Portfolio Manager has defined certain industries that warrants an increased ESG monitoring and in which the Portfolio Manager refrains from investing. These are alcohol, conventional weapons and companies that generate at least 30% of their turnover from the production of fossil fuels and coal. The exclusion does not concern investment funds managed by co-operation partners of the Portfolio Manager, since the Portfolio Manager is unable to affect the portfolio construction of external investment funds.

The Portfolio Manager exercises an active ownership policy on behalf of the Fund especially in companies in which the Fund has a considerable ownership. The Portfolio Manager regularly meets with the management of the companies and participates in their general meetings and nomination committees. This way the Portfolio Manager strives to improve the prospects of long-term success of the company.

A prerequisite is that the target company adheres, in addition to applicable legislation, to international standards and treaties referring to human rights, labor force, corruption and sustainable development (such as the OECD Guidelines for Multinational Enterprises and the UN Guiding Principle on Business

and Human Rights). If the target company continuously breaches these provisions, the Portfolio Manager may by decision of the portfolio management team exclude such companies from the investment universe.

The target company shall further adhere to international reporting standards.

### 5.11.3 Promotion of environmental or social characteristics

The Fund is an actively managed thematic ESG fund. The Fund invests globally and selectively in companies in the water industry whose principal business is based on water-related activities such as water infrastructure or water technology emphasizing sustainable companies. The environmental and social impacts of investment targets and governance are taken into account in the investment decisions in accordance with the Portfolio Manager's ESG strategy.

Responsible investments are implemented by the following strategies of the Portfolio Manager:

**ESG-integration or the consideration of responsibility aspects in the investment decisions.** When analyzing company specific risks of the target investment, the Portfolio Manager takes responsibility aspects into account as a part of the broader picture and monitors these in addition to economic analyses and figures. The Portfolio Manager supports its responsibility assessment with third-party ESG analyses and classifications. The Portfolio Manager also collects its own ESG data e.g. in connection with meetings with the company.

**Adherence to international standards.** A prerequisite is that the target company adheres, in addition to applicable legislation, to international standards and treaties referring to human rights, labor force, corruption and sustainable development. If the target company continuously breaches these provisions, the Portfolio Manager may by decision of the portfolio management team exclude such companies from the investment universe.

**Ownership policy.** The Portfolio Manager exercises an active ownership policy on behalf of the Fund especially in companies in which the Fund has a considerable ownership. The Portfolio Manager regularly meets with the management of the companies and participates in their general meetings and nomination committees. This way the Portfolio Manager strives to improve the prospects of long-term success of the company. The ownership policy of the Portfolio Manager further describes its activities and is available on its webpage, [www.wip.fi](http://www.wip.fi).

**Exclusion.** The Portfolio Manager excludes and refrains from investing in companies that generate a significant share of their turnover from unethical or environmentally harmful industries. The Portfolio Manager has excluded producers of tobacco, cannabis, adult entertainment, gambling and weapons banned by international treaties (e.g. nuclear weapons, land mines, cluster weapons and chemical and biological weapons) from its investment universe. In addition, the Portfolio Manager has defined certain industries that warrants an increased ESG monitoring and in which the Portfolio Manager refrains from investing. These are alcohol, conventional weapons and companies that generate at least 30% of their turnover from the production of fossil fuels and coal.

The exclusion does not concern investment funds managed by co-operation partners of the Portfolio Manager, since the Portfolio Manager is unable to affect the portfolio construction of external investment funds. However, the Portfolio Manager requires that the investment fund has

implemented responsibility as a part of its investment activities. In addition, the Portfolio Manager requires comprehensive and transparent fund reporting.

## 6 Rules (see attachment)