# Prospectus

# WIP Technology Fund AIF

# 12 September 2025

**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.

# Contents

# 1 Important information

## 1.1 General

This is the fund prospectus of WIP Technology 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 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 Fund Management 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 Technology Fund AIF

## 2.1 Information on 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.

| | |
|---|---|
| **Name of the Fund** | WIP Technology Fund AIF |
| **Liquidity** | Daily |
| **Launch date** | 31.3.2021 |
| **Latest date of approval of the fund rules** | 26.5.2023 |
| **Annual report** | Available free of charge from the Portfolio Manager or the AIFM |
| **Value development** | Available free of charge from the Portfolio Manager or the AIFM |
| **Date of financial statement** | 31.12. |
| **Auditor** | KHT Kristian Berg<br>Deputy auditor: Auditing firm Ernst & Young Ltd |
| **Description of arrangements for managing the Fund's liquidity risks** | 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.<br><br>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. |

## 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 Finnish non-UCITS fund that places its assets globally in technology companies. The aim of the fund is to achieve the highest possible capital appreciation by placing its assets with moderate risk taking in technology companies especially in the USA and the Nordic countries.

The assets of the fund are mainly placed in companies that can be divided into three categories: 1) Stable and global, large technology companies, 2) fast growing platform companies increasing their market shares, 3) small and mid-sized technology companies in the Nordic countries.

In the selection of target investments, especially the following features of the company are considered: the possibility to reach a strong market position either globally or within its own market segment, a fast-growing turnover and profit, its innovative nature and that its management has been deemed exceptionally good in its field.

## 2.3 Unit series

The fund is offered to investors in two unit series.

| Unit series | A unit | I unit |
|---|---|---|
| Minimum subscription (EUR) | 1 000 | 250 000 |
| Subscription fee | 0% | 0% |
| Redemption fee | 0% | 0% |
| Management fee*1 | 1.0% p.a. | 0.8% p.a. |
| Performance fee*2 | 20% | 20% |
| ISIN | FI4000496260 | FI4000496278 |
| Currency | EUR | EUR |
| Type of units | Growth | Growth |

*1 Includes the fees to the Portfolio Manager and the AIFM.

*2 The performance fee is charged on the part of the fund unit's return that exceeds the return of MSCI ACWI Net Return EUR Index during the calculation date and its current calendar year. The calculation of the performance fee will begin 1 January 2022. The performance fee follows a fulcrum fee model, which means that any underperformance of the Fund compared to the benchmark during the reference period will be recovered before the fee can be paid out from the Fund.

## 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** | **GRIT Fund Management Company Ltd** |
| Address: Mannerheimintie 18 A, FI-00100 Helsinki | Address: Pitkäkatu 34C, FI-65100 Vaasa |
| Email: backoffice@wip.fi | Email: fundadmin@gritfundservices.fi |

| | |
|---|---|
| Subscription amount and order | The banking day preceding the subscription day by 23:59 |
| Subscription day | Every banking day |
| Redemption order | The banking day preceding redemption day by 23:59 |
| Redemption day | Every banking day |
| Redemption payment | Within five (5) banking days from publication of the value |
| Subscription account (IBAN) | FI86 1318 3000 1094 46 |

## 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 before the intended subscription date. 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 compromise 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.

The management fee and the performance fee are fees charged for the management and portfolio management of the Fund and are paid to the AIFM, which in turn will pay a part of the fees to the Portfolio Manager. The fees are paid per unit series and are charged according to the table in section 2.3.

The benchmark index of the Fund's performance fee is the MSCI ACWI Net Return EUR index, and the crystallization period used in the calculation is one calendar year. The Fund's performance fee is always realized at the end of the calendar year, after which a new crystallization period begins. The performance fee is 20% of the part of the Fund unit's return that exceeds the return of the MSCI ACWI Net Return EUR Index during the calculation date and its current calendar year. The performance fee is calculated separately for each fund unit series on each Valuation Day.

The performance fee follows a fulcrum fee model, which means that any underperformance of the Fund compared to the benchmark during the reference period will be recovered before the fee can be paid out of the Fund. If the Fund outperforms the benchmark during the crystallization period and has compensated for any underperformance compared to the benchmark, a performance fee may be paid from the Fund at the end of the crystallization period. The performance fee can also be paid when the Fund's return has been negative but better than the benchmark. The performance fee model is symmetrical.

The length of the Fund's reference period is the entire life of the Fund until the Fund has been operating for at least five calendar years. Thereafter, a rolling reference period of five calendar years shall apply. The first possible realization date is December 30, 2022, and after that on the last banking day of the year.

The fund aims to perform as well or better than the global stock market, so the benchmark index is the right incentive for the portfolio management. The ten largest companies in the benchmark are technology companies, so the investment environment, risk-return profile and also the geographical distribution are similar between the Fund and the benchmark.

The table below provides a hypothetical example of how the realization of a performance fee would occur during the first five years of the Fund. After the first year, the Fund would have outperformed the index during the crystallization period, so a performance fee will be paid from the Fund on the crystallization day. In its second year, the index has outperformed the Fund, although both have been negative. Therefore, no performance fee will be paid from the Fund. In the third year, the return of both is positive, but the index has outperformed the Fund in the crystallization period. Therefore, no performance fee will be paid from the Fund. In the fourth year, the Fund has outperformed the index, but the return is not sufficient to recover the underperformance of the previous two years compared to the benchmark. Therefore, no performance fee will be payable from the Fund. In the fifth year, the Fund would have outperformed the index in the reference period, as well as managed to recover for the earlier underperformance compared to the index during the reference period, so a performance fee will be paid from the Fund.

| | Index return * | Fund return* |
|---|---|---|
| Year 1 | 3% | 7% |
| Year 2 | -1% | -2% |
| Year 3 | 5% | 4% |
| Year 4 | -3% | -2% |
| Year 5 | 3% | 12% |

*during a calendar year

Beside the fees of the Fund, all other costs, expenses, charges and fees which are essential for the operation, administration, financing, custody, sub-custody, business or the investments are charged from the Fund’s value. Such costs are for instance the Fund’s trading and banking expenses, costs in relation to the use of third-party services, costs for setting up the Fund, costs for evaluating, valuing and deciding on investment objects, auditing costs, authoritative costs and statutory reporting expenses. These costs are split evenly between the fund unit holders in relation to their ownership, and the amount of such costs are affected by i.e. the investment activity and the size of the Fund.

The costs associated with the operation of the Fund are paid using the assets of the Fund in accordance with the Fund rules and 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 report of the Fund is prepared, and is available to the fund unit holders from the AIFM or the Portfolio Manager free of charge. The historical performance of the Fund is also available from the AIFM or the Portfolio Manager.

The limit for a significant error in the calculation of the value of the Fund is ≥ 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.

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| **Name** | WIP Asset Management Ltd |
| **Established** | 20.12.1995 |
| **Business ID** | 1029199-9 |
| **Home state** | Finland |
| **Domicile** | Helsinki |
| **Postal and visiting address** | Mannerheimintie 18 A, FI-00100 Helsinki |
| **License(s)** | Portfolio management, investment advice, execution of orders and transmission of orders |

## 3.2 Alternative Investment Fund Manager

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|---|---|
| **Name of the AIFM** | GRIT Fund Management Company Ltd |
| **Established** | 22.4.2004 |
| **Business ID** | 1830022-0 |
| **Share capital** | 275 334 euros<br>(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) |
| **Home state** | Finland |
| **Domicile** | Helsinki |
| **Administrative headquarters** | Vaasa |
| **Postal & visiting address** | Pitkäkatu 34 C, FI-65100 Vaasa |
| **Business activities** | Investment fund activities and activities essentially related thereto<br>Alternative investment fund manager |

| | |
|---|---|
| **License(s)** | Licensed fund management company and licensed alternative investment fund manager (AIFM) |
| **Members of the board of directors** | Daniel Djupsjöbacka<br>Birgit Köster Hoffmann*<br>Anders Kulp*<br>Keith Hazley*<br>* Independent board member |
| **CEO** | Mathias Österberg |
| **Auditor** | KHT Kristian Berg<br>Deputy auditor: Auditing firm Ernst & Young Oy |

## 3.3 Depositary

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|---|---|
| **Name of the depositary** | Skandinaviska Enskilda Banken AB (publ), Helsinki branch |
| **Line of business** | Banking |
| **Place of business of the branch** | Helsinki, Finland |
| **Domicile** | Stockholm, Sweden |

The depositary is responsible 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 value 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 AIFM evaluates the Fund's risk classification annually i.a. in accordance with the SRI risk measure, and always disclose the updated level of risk in the key investor information document.

## 4.2 Main risks in brief

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|---|---|
| **Equity risk** | 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. |
| **Style and industry risk** | The fund's investment style may affect the fund's performance, which may differ from the general performance of the equity market. The fund also invests in companies in a certain industry within the framework of the 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 may increase the Fund's trading costs, for example in connection with large redemptions. |
| **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. |

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| **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 Conflicts 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 a situation may arise e.g. between two investors, the AIFM and a company in the same company group and/or its employees.

The AIFM applies written guidelines as well as processes to prevent, identify, manage, and disclose conflicts of interest. In its activities, the AIFM seeks to avoid conflicts of interest and to ensure equal treatment of investors and stakeholders. Regarding portfolio management, the AIFM ensures that the Portfolio Manager has adequate policies, procedures, and structural arrangements in place for the prevention, identification, management, and disclosure 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 prefilled 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.

## 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.

More detailed information on the Portfolio Manager's ownership policy is available at 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 processes 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. It contains further information on how the AIFM processes 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.

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. For more information on the Portfolio Manager's privacy policy, please contact 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.

## 5.11 Sustainability-related disclosures

Sustainability risks are not considered because they are not deemed relevant for the strategy of the Fund.

The principal adverse sustainability impact is not deemed relevant for the strategy of the Fund. The AIFM or the Portfolio Manager does not intend to consider such impact in the future.

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

# 6 Rules (see attachment)