



OTP EUR Short Bond Fund

Prospectus and Management Policy

Budapest, March 2024

Supervisory authorisation number of the Fund: III/110.178-1/2001

Date: 18.12.2001

Effective: 14.03.2024

Date of conversion of this UCITS (subject to publication of the MNB resolution approving the Fund Management Policy): 27.02.2024

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Conversion notice

OTP Alapkezelő Zártkörűen Működő Részvénytársaság (registered office: H-1026 Budapest, Riadó utca 1-3., company registration number: 01-10-043959, hereinafter referred to as ‘Fund Manager’) hereby informs Investors that the Magyar Nemzeti Bank (Central Bank of Hungary, hereinafter referred to as “Supervisory Authority”) has approved, with its permission resolution No. **H-KE-III-36/2024** of 19 January 2024, the conversion of **OTP EUR Short Bond Fund** (hereinafter referred to as “Fund”) into a harmonised securities investment fund under Directive 2009/65/EC of the European Parliament and of the Council on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS) (hereinafter referred to as “UCITS Directive”).

Reasons for the conversion of the Fund

The conversion of the Fund enables the Fund Manager to continue administering the fund with a potential for an even wider scope of sales. In conformity with the UCITS Directive, compliance with even higher uniform European standards applicable to investment funds better promotes and safeguards the interests of investors than ever before. As a fund harmonised under the UCITS Directive, the Fund will also be available to foreign investors, potentially contributing to the growth of the Fund and thereby also benefitting Hungarian investors as it would improve the cost-effectiveness of the Fund.

Date of the conversion of the Fund

The date of conversion is **27 February 2024**.

Conditions for the conversion of the Fund

The Fund Manager does not attach any conditions to the conversion. A statutory requirement for the conversion is for the Fund Manager to prepare an amended prospectus stating the reasons, date and conditions for the conversion and submit it to the Supervisory Authority for approval.

Subject to the permission of the conversion, i.e. the approval of the amended prospectus by the Supervisory Authority, the Fund shall be converted on the date set as the date of conversion in this Prospectus. **Investors of the Fund shall incur no indirect costs in relation to the conversion.**

Option of redemption free of charge or commission

Having obtained the Supervisory Authority’s permission for conversion, the Fund Manager shall publish this notice including the fact that the conversion has taken place and its essential conditions. Between the publication of the conversion notice and the date of conversion, there will be a 30-day period available for Investors who no longer want to keep their investments in the Fund to request the redemption of their fund units without any additional charges or commissions and such redemption shall be settled by no later than the date of the conversion of the Fund. The start date for the charge- and commission-fee redemption period shall be 26 January 2024 and its end date shall be the last trading day prior to the conversion, i.e. 26 February 2024.

As part of the redemption process, Investors may incur tax liability under the tax laws in force on the redemption date and as set out in Chapter 5 of the Prospectus.

Investors who want to maintain their investment, do not have to do anything.

The Fund Manager’s decision on and the Supervisory Authority’s approval for the conversion of the Fund

For the aforementioned reasons, the Manager’s Board of Directors adopted Resolution No. 2/2023 (05.10.) of 10 May 2023 on the conversion of the Fund. The Supervisory Authority approved the information notice on the conversion in its Resolution No. H-KE-III-36/2024.

Features of the Fund concerned by the conversion and a summary of changes

Change in the harmonisation of the Fund

No new fund is created with the conversion of the Fund. A conversion under Section 80(1) is a change to a feature of the Fund pursuant to Section 67(1)(f) of the Collective Investments Act, meaning that the type of harmonisation of the Fund changes from a fund harmonised under the AIFMD Directive to a fund harmonised under the UCITS Directive as of the date of the conversion.

Change in the Depositary of the Fund

Due to the conversion of the Fund, pursuant to Section 62(1) of the Collective Investments Act, the credit institution incorporated in Hungary licensed to provide the safe custody services specified in Section 5(2)(b) of the Investment

Firms Act and appointed by the investment fund manager to provide depositary services in respect of the Fund managed by it shall be UniCredit Bank Hungary Zrt. (registered office: H-1054 Budapest, Szabadság tér 5–6.).

No changes in the Fund's investment policy as a result of the conversion

The purpose of the Fund remains to offer flexible investment products for investors with funds available for at least 12 months. To accomplish the objective of the Fund, the Fund Manager invests most of the Fund's assets in bank deposits and government securities and, in given cases, corporate bonds and collective investment securities issued by other investment funds. The Fund Manager can also execute derivative transactions in order to mitigate the interest risk and optimise currency risk.

Change in the investment limits of the Fund

As a result of the conversion, the Fund's investment limits shall change in order to ensure the Fund's compliance with the legal requirements applicable to UCITS-type funds that are stricter than the rules applicable to AIFs.

Taxation information regarding the conversion of the Fund

The conversion of the Fund does not involve tax payment by Investors and the features of the Fund Units set out in the Fund Management Policy shall remain unaffected.

Pursuant to the provisions of Section 65(6) of the PIT Act, no interest income shall be determined in the case of the conversion of the predecessor's collective investment security into the successor's collective investment security as a result of the transformation or merger of the collective investment trust, with the proviso that in such cases, the value of the predecessor's security shall be taken into account as the value of the acquisition of the successor's security.

For more information on taxation, Investors may refer to Chapter 5 of the Prospectus.

Implications of the conversion of the Fund on the cross-border distribution of Fund Units

Following the conversion of the Fund, the Fund Manager shall initiate the passporting of the Fund abroad in order to ensure that Fund Units are also available to foreign Investors. As a result, the Prospectus and Fund Management Policy of the Fund will also include terms and conditions for distribution abroad.

The amended documentation (Prospectus and Fund Management Policy, Key Information Document) of the Fund shall be accessible to Investors at the Fund's points of sale, on www.otpalapkezelő.hu and the Supervisory Authority's website www.kozzetetelek.hu.

Budapest, 22 January 2024

OTP Alapkezelő Zrt.

PROSPECTUS

I. Particulars of the Fund

1. BASIC INFORMATION ON THE INVESTMENT FUND

1.1 Name of the Fund

OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
Name used for distribution abroad: OTP EUR Short Bond Fund

1.2 Concise name of the Fund

OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
Name used for distribution abroad: OTP EUR Short Bond Fund

1.3 Registered office of the Fund

H-1026 Budapest, Riadó u. 1–3, Hungary

1.4 Name of Fund Manager

OTP Alapkezelő Zrt.

1.5 Name of Depositary

UniCredit Bank Hungary Zrt.

1.6 Name of Distributor

1.6.1 Principal Distributor:

OTP Bank Plc.

1.6.2 Co-distributors:

UniCredit Bank Hungary Plc, Concorde Securities Plc., Raiffeisen Bank Plc., SPB Investment Plc.

DSK Bank EAD – Continuous distribution of the Fund Units commences after passporting of the Fund.
Nova KBM d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.
OTP banka d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

1.7 Form of operation of the Fund

Public

1.8 Type of the Fund

Form of operation of the Fund: Open-end

1.9 Maturity of the Fund

Unfixed

1.10 Harmonisation of the Fund

It is an investment fund authorised by the Supervisory Authority and harmonised in accordance with the UCITS Directive.

1.11 Number and description of any series issued by the Fund, showing the differences between each series

The Fund has issued two series, marked “A” and “I”. The nominal value of Series “A” and “I” Fund Units is EUR 0.01 each, their Currency of Issue and Settlement is the euro.

The Fund Unit series are different from each other:

in respect of the scope of eligible buyers during the primary distribution:

There are no restrictions concerning the scope of investors in respect of the Series “A” Fund Units issued by the Fund; all persons having a legal-entity status in compliance with the rules of the jurisdiction applicable at the relevant point of sale and complying with the rules set out in the terms and conditions of distribution may purchase the Fund Units. In Hungary, Fund Units can be purchased by resident and non-resident natural and legal persons – except US citizens – as well as unincorporated businesses.

The marketability of “I” series Fund Units is limited; they can be purchased exclusively by Professional Investors invited by the Fund Manager.

- in respect of the level of fees and commissions charged:

The three series differ from each other in respect of the fund management fee paid by the Fund to the Fund Manager and in respect of the sale and redemption commissions charged during the period of continuous distribution.

- in respect of Points of Sale:

In the course of primary distribution, Series “A” Fund Units are available at the Points of Sale specified in Annex 2.a, and series “I” Fund Units are available at the Points of Sale specified in Annex 2.b.

1.12 Primary category of assets in which the Fund may invest

It is a securities fund.

1.13 Capital or yield guarantee, capital or yield protection applicable to the Fund

Not applicable.

1.14 Other information related to the Fund

Cross-border marketing: After passporting and obtaining marketing authorisation for the Fund, the Fund Units also become available abroad (in another EEA State or a third country). The special terms and conditions of cross-border marketing are highlighted in the appropriate sections of the Fund Management Policy.

2. RESOLUTIONS RELATING TO THE FUND

2.1 Number and date of the Fund Manager’s resolution on the offering of the Fund Units

The Fund Manager decided on offering the Series “I” Fund Units by way of Board of Directors Resolution No. 2/2023 (06.09.) dated 09 June 2023.

2.2 Number and date of the Supervisory Authority’s resolution on authorising the public offering of the Fund Units

The Supervisory Authority authorised the public offering of the Fund Units on 30 November 2001 by way of its Resolution No. III./110.178/2001.

2.3 Number and date of the registration of the Fund by the Supervisory Authority

The Fund was registered on 18 December 2001; number of the resolution ordering its registration: III./110.178-1/2001.

2.4 Registration number of the Fund

Fund registration number: 1111-118.

2.5 Number and date of the Fund Manager’s resolutions on the approval or amendment of the Prospectus and the Fund Management Policy

In connection with the conversion into a harmonised investment fund under the UCITS Directive, the Fund Manager decided on amending the Fund Management Policy by Board of Directors Resolution No. 2/2023 (05.10) of 10 May 2023.

The Fund Manager decided on offering the Series “I” Fund Units by way of Board of Directors Resolution No. 2/2023 (06.09.) dated 09 June 2023.

2.6 Number and date of the Supervisory Authority’s resolutions on the approval of amendments to the Prospectus and the Fund Management Policy

Date	Resolution No.
30.11.2001	III/110.178 /2001
03.01.2002	III/110.178-1/2001
31.05.2002	III/110.178 -2/2002
13.04.2005	E-III/110.178-3/2005
06.09.2005	E-III/110.178-4/2005
17.10.2006	E-III/110.178-5/2006
17.09.2007	E-III/110.178-6/2007
09.05.2013	H-KE-III-262/2013
03.03.2014	H-KE-III-206/2014
31.03.2015	H-KE-III-349/2015
09.12.2016	H-KE-III-800/2016
21.12.2018	H-KE-III-604/2018
08.06.2020	H-KE-III-397/2020
15.12.2021	H-KE-III-756/2021
13.01.2023	H-KE-III-22/2023
26.06.2023	H-KE-III-334/2023
19.01.2024	H-KE-III-36/2024

2.7 Other information related to the Fund

Not applicable.

3. RISK PROFILE OF THE FUND

3.1 Objective of the Fund

The purpose of the Fund is to offer flexible investment products for investors with funds available for at least 12 months.

3.2 Profile of the typical investor for whom the Units of the Fund are recommended

In Hungary, the Fund Units issued by the Fund can be purchased by resident and, with the exception of US nationals, non-resident natural and legal persons (series “I” Fund Units are only available to Professional Investors contacted by the Fund Manager) provided that they comply with the rules defined in the terms and conditions of the offering. The Fund Units may not be offered, sold or forwarded in the territory of the United States of America or to or on behalf of US persons. The Fund is also recommended to our risk-averse customers for investing their available disposable funds.

Based on the scope of potential investors – in line with the concept system applied in Section 67(1)(b) of the Collective Investments Act –, the Series “A” Fund Units can be defined as Fund Units offered to retail investors; this, however, should not be understood as a limitation of the scope of investors as indeed, Series “A” Fund Units can be purchased by both retail and professional investors.

As regards the series “I” Fund Units, the scope of eligible investors during primary distribution is limited to Professional Investors contacted by the Fund Manager.

3.3 Categories of assets in which the Fund is authorised to invest, with an indication whether the Fund is authorised to conduct transactions in financial derivative instruments

Government securities and securities guaranteed by the state

Government securities are debt securities issued by the European Union, a Member State of the European Union – including the government department, agency or special purpose vehicle thereof –, in the case of federal Member States, a Member of the Federation, a special purpose vehicle for several Member States, an international financial institution established by two or more Member States which has the purpose of mobilising funding and provide financial assistance to the benefit of its members that are experiencing or threatened by severe financing problems, or by the European Investment Bank.

Bank deposits (demand deposits or time deposits)

In order to ensure the Fund's liquidity or in cases where the Fund is unable to properly invest its uncommitted capital into securities, the Fund Manager is entitled to deposit the Fund's uncommitted capital at credit institutions in demand deposits or in deposits that are redeemable at notice, provided that the registered office of the credit institution is in a Member State of the European Union or, if the credit institution's registered office is not in a Member State, it is subject to prudential rules which, in the opinion of the Supervisory Authority, are equivalent to the provisions set out in Union legislation.

Securities financing transactions

Repurchase and reverse repurchase transactions

A repurchase and a reverse repurchase transaction means any agreement for the transfer of securities or guaranteed rights relating to title to securities where the guarantee is issued by a recognised exchange which holds the rights to the securities and the agreement does not allow the seller to transfer or pledge a particular security to more than one counterparty at a time, and also contains a commitment of the seller to repurchase and a commitment of the buyer to resell the given securities – or securities of the same type substituting the given securities – at a specified price on a future date specified, or to be specified, by the transferor. Such transaction shall be regarded as a repurchase agreement for the person selling the securities and a reverse repurchase agreement for the person buying them.

Buy-sell back and sell-buy back transactions

A buy-sell back or a sell-buy back transaction means a transaction by which a counterparty buys or sells securities or guaranteed rights relating to title to securities agreeing, respectively, to sell or to buy back securities or guaranteed rights of the same description at a specified price on a future date; that transaction shall be regarded a buy-sell back transaction for the counterparty buying the securities or guaranteed rights, and a sell-buy back transaction for the counterparty selling them.

Securities lending and securities borrowing

A transaction where the counterparty transfers securities to a borrower with the commitment of the borrower to return the same securities on demand or at a pre-specified future date; for the counterparty transferring the securities the transaction is a securities lending transaction, and for the counterparty receiving the securities, it is a securities borrowing transaction.

Mortgage bonds and other secured bonds

In addition to Hungarian mortgage bonds issued publicly in accordance with Act XXX of 1997 on Mortgage Banks and Mortgage Bonds, the Fund can also purchase mortgage bonds publicly issued by foreign mortgage banks as well as other secured bonds.

Other debt securities, financial market instruments, structured bonds

Compared to government securities – depending on the guarantees associated with them –, bonds, money market instruments and structured bonds issued by other organisations (e.g. economic operators, credit institutions, municipalities and other institutions) represent a higher risk level.

Collective investment securities

The Fund shall be permitted to include fund units and other collective securities in its portfolio subject to the limitations applicable to the investment policy.

Other bond type securities issued abroad

According to their own legislation, foreign countries can issue securities that have no Hungarian equivalent. The Fund Manager can purchase such securities for the Fund, provided that the limitations applicable to its investment policy are observed.

Forex instruments

The Fund Manager may invest the assets of the Fund in instruments denominated in foreign currencies, currency pairs or derivatives for such instruments.

Derivative instruments

A derivative contract is a transaction whose value depends on the value of the underlying investment instrument, foreign exchange, or reference rate (underlying instrument) and which may itself be traded.

Scope of eligible derivative instruments:

Derivative financial instruments traded on regulated markets, including equivalent cash-settled instruments and non-standardised derivative financial instruments traded over the counter (OTC derivative contracts), provided that:

- the underlying instruments of such OTC derivative contracts are eligible instruments, or financial indices, interest rates, exchange rates or currencies in which the Fund is permitted to invest in accordance with its investment objectives laid down in the Fund Management Policy;

- the counterparties to such OTC derivative contracts are institutions subject to prudential supervision and classified into the categories authorised by the Supervisory Authority, and

- the reliable and verifiable daily valuation of such OTC derivatives is ensured and, at the Fund's initiative, the contracts can be sold, liquidated or closed by an offsetting transaction at any time at their fair market value.

3.4 *A prominent statement drawing attention to the sections of the Fund's Management Policy where the risk factors of the Fund are presented*

Significant risk factors pertaining to the Fund are presented in Section 26 of the Fund Management Policy.

3.5 *Objective of transactions in derivative instruments, and the possible outcome of the use of derivative instruments on the risk profile*

The Fund uses derivative instruments for hedging purposes and for the efficient development of the portfolio. Transactions concluded for hedging purposes reduce the Fund's exposure to foreign currency or other instruments. With the use of positions taken for the efficient development of the portfolio, we undertake a market exposure through derivative instruments, which may increase the risk of the portfolio through the risk of default associated with derivative contracts.

3.6 *A prominent statement drawing attention to the special risks arising from exposure to a specific institution in excess of 20%*

The Fund's consolidated risk exposure to an institution arising from investments in transferable securities or money market instruments issued by the same institution, or in deposits placed or OTC derivative contracts concluded with the given institution may not exceed 20 percent of the Fund's assets.

3.7 *Where the Fund invests principally in any category of assets other than transferable securities or money market instruments, or where the Fund replicates a specific index, a prominent statement drawing attention to that clause of the Fund's investment policy*

Not applicable.

3.8 *A prominent statement drawing attention to the fact that the net asset value may be highly volatile due to the possible composition of the portfolio*

Not applicable.

3.9 *A prominent statement drawing attention to the fact that under the authorisation of the Supervisory Authority, the Fund may invest up to 100 percent of its assets in various transferable securities or money market instruments which were issued by an EEA Member State or its municipality, a third country, or an international organisation to which one or more Member States belong*

With permission from the MNB, the Fund may invest up to 100 percent of its assets in securities issued or guaranteed by an EEA or OECD member state or in debt securities issued or guaranteed by an international financial institution,

provided that not more than 30 percent of its assets may be invested in securities of a given series and it invests in at least 6 different series.

The 35% exposure for the assets in the Fund may be exceeded when investing in securities issued by the following issuers:

- France
- Germany
- Italy
- Spain
- Hungary
- Romania
- European Union
- European Stability Mechanism

3.10 Other information related to the Fund

Sustainability risks: environmental, social or governance events or circumstances, whose occurrence or existence could have an actual or potential material adverse effect on the value of the investment.

Sustainability risks from environmental impacts include, for example, inadequate management of climate change-related processes, social impacts include failure to enforce internationally recognised labour standards or inadequate efforts to address gender pay gaps, while risks from corporate governance include, for example, non-compliance with workers' rights and data protection requirements.

Sustainability risks may be significant in themselves but, if they materialise, they may also have a material impact on other risk factors and may, for example, adversely affect the level of market risk, liquidity risk, credit risk or operational risk, or adversely affect the value of the Fund's investments, including the overall loss in value, thereby adversely affecting the Fund's performance. Sustainability risks are therefore considered to be normal risks.

Sustainability risks from environmental, social and corporate governance impacts may also materialise in a company-specific manner, where the market value of financial instruments issued by companies that do not comply with sustainability requirements may decrease due to the sustainability risks, which may be caused by events affecting the company's reputation, sanctions imposed on the company or even physical risks triggered by the climate change.

Sustainability risks may also appear in operational risk – causing losses to the Fund as a whole – if the Fund Manager or the service providers engaged by it do not pay sufficient attention to environmental, social and governance considerations.

In making its investment decisions relevant to the Fund, the Fund Manager considers and duly assesses sustainability risks arising from environmental, social and governance aspects among all risks associated with the investment. The purpose of incorporating sustainability risks into investment decisions is to ensure that the risks are recognised as soon as possible so that their impact on the Fund's assets can be properly managed and mitigated.

In the risk management procedures applied by the Fund Manager, the Fund Manager takes account of and measures all risks relevant to the Fund as listed in this section; thus, in particular, the sustainability risks arising from environmental, social and governance aspects, applying risk indicators to assess the risks. Risk indicators assess the risks from each aspect of the sustainability risk in consideration of quantitative and qualitative indicators. The Fund Manager uses ESG ratings and scores provided by an external data provider for the Fund. The data provider uses an extensive industry and company-specific database to summarise and classify each environmental, social and governance segment in a defined way, and then converts these into a single ESG indicator. The Fund Manager uses the indicators provided by the data provider in the investment decision making process.

The Fund Manager integrates sustainability risks and their management in the Fund's decision making processes; accordingly, the Fund is in line with Article 6 of the SFDR Regulation.

The Fund does not aim to promote environmental and/or social characteristics (does not fall within the scope of Article 8(1) of the SFDR Regulation) or make sustainable investments (does not fall within the scope of Article 9(1), (2) and (3) of the SFDR Regulation).

4. ACCESS TO INFORMATION PROVIDED TO INVESTORS

4.1 Name of the place where the Fund's Prospectus, Fund Management Policy, Key Information Document and periodic reports may be obtained, and where communications within the framework of extraordinary

disclosure of information – such as information on payments made to investors and on the redemption of Fund Units – are made available

The Fund's (Information Notice) Prospectus, Fund Management Policy, Key Information Document and periodic reports, as well as extraordinary disclosures, the Fund's announcements, and information on payments to investors are published on publication sites; i.e. on the website of the Fund Manager acting on behalf of the Fund (<https://www.otpbank.hu/otpalapkezelelo/hu/fooldal>), on the website of OTP Bank Plc. acting as Principal Distributor (<https://www.otpbank.hu>), and on the publicly available publications platform operated by the Supervisory Authority (<https://kozzetetelek.mnb.hu>). The Information Notice, the Fund Management Policy and the Key Information Document are available in printed form at the investor's request at the Points of Sale.

If the governing law applicable to any Foreign Distribution Territory prescribes as a condition precedent the use of any other places of publication for the distribution of the Fund Units, the relevant information shall be published in the Distribution Summary of the Distribution Territory concerned.

4.2 Other information related to the Fund

Not applicable.

5. TAXATION INFORMATION

This section sums up the general taxation rules applicable to the Fund, based on the tax regulations in effect upon the approval of the Prospectus and upon authorisation by the Supervisory Authority. It is the Investor's responsibility to obtain detailed information from the applicable regulations once the Investor is fully aware of the facts. Please note that tax implications may only be assessed based on the Investor's specific circumstances and that they may be subject to change in the future.

Cross-border marketing: The Fund Manager wishes to warn investors that a thorough inspection of taxation regulations is indispensable for making informed investment decisions, and that the taxation rule may be different for cross-border sales.

5.1 Brief summary of the tax regulations applicable to the Fund which are relevant to investors

Under the effective regulations, the Fund is not subject to tax liabilities in Hungary on the proceeds obtained. In the case of interest, dividend and capital gain or any other potential income from foreign investments, these incomes may be subject to taxes in the source country (where the income was acquired). The taxation of incomes from foreign investments is determined by the national legislation of the specific country and the treaty – if any – for the avoidance of double taxation between the specific country and Hungary.

Special tax imposed on investment funds

Under the effective legal regulations, the Fund is subject to a special tax. The tax base is calculated as follows: consolidated value of the fund units of the funds managed by the investment Fund Manager for the specific quarter – recorded for the calendar days of the quarter at net asset value – divided by the calendar days of the quarter, not including the HUF value of the securities held by the collective investment trust and recorded on these accounts, calculated as per the above. The annual tax rate is 0.05 percent of the tax base. The tax liability is assessed, collected and declared by the Fund Manager and the assessed and collected – or not collected – tax is paid by the Fund Manager (tax collection). The tax liability shall be assessed on a quarterly basis by the 20th day of the month following the reference quarter, and declared and paid by the same date using the form provided by the tax authority.

5.2 Details of deductions made at source from the yields and capital gains paid to investors

5.2.1 Taxation of resident private individuals

Interest income from the Fund Units

Pursuant to Section 65(1)(b) of Act CXVII of 1995 on Personal Income Tax as amended from time to time ("PIT Act"), interest income shall mean

"b) in connection with collective investments which are offered and traded publicly and if they fit the definition contained in the Act on the Capital Market,

ba) the income paid (credited) to the private individual under the title of interest and/or yield, if the securities are held at a specific time prescribed as a precondition for entitlement to interest and/or yield,
bb) the gains attained when called, redeemed, or transferred [not including the transfer of collective investments in transferable securities on an exchange market in accordance with the Act on the Capital Market, or in a market of another EEA Member State or in a Member State of the Organisation for Economic Cooperation and Development (OECD)] from the income payable to the private individual – irrespective of the net current value, accumulated interest or yield it represents – to the extent established according to the provisions on capital gains;”

Under the PIT Act, interest income shall mean the amount paid as interest and/or yield on publicly offered and traded collective investment securities, as well as that part of the income obtained from Fund Units (transferred over the counter) which exceeds the sum of the purchase price of the securities and any incidental costs associated with the acquisition of the securities.

Pursuant to the provisions of Section 65(6) of the PIT Act, from the income referred to in Subparagraph ba) of Subsection (1) – if it qualifies as interest and/or yield first obtained following the acquisition of securities – the interest and/or yield paid as part of the purchase price of the securities up to the date of purchase that is calculated and accumulated according to the conditions of the securities may be deducted; however, in the case mentioned in Subparagraph bb) of Subsection (1), the amount deducted in this manner may not be taken into consideration as part of the purchase price of the securities when the securities are called, redeemed or transferred.

Pursuant to the provisions of Section 65(6) of the PIT Act, no interest income shall be determined in the case of the conversion of the predecessor's collective investment security into the successor's collective investment security as a result of the transformation or merger of the collective investment trust, with the proviso that in such cases, the value of the predecessor's security shall be taken into account as the value of the acquisition of the successor's security.

Tax liability on interest income from the Fund Units

The tax on interest income is regulated by Section 65(2) of the PIT Act as follows:

“The tax, if the interest income:

a) is received from a payer [in the application of this Section, payers are credit institutions or investment service providers paying the interest income in lieu of the payer], shall be established for the time of acquisition, and shall be deducted, paid and declared by the payer, with the exception that, on redemption or transfer of the investment unit, the private individual shall be entitled to claim in their tax return filed without assistance from the tax authority or by way of self-assessment that part of the purchase price of securities and the incremental costs associated with the securities that the payer did not take into account when determining income:

aa) subject to a certificate issued by the payer that contains an indication, entered by the payer at the private individual's request, of having issued the certificate for the said purpose,

ab) provided that the private individual declares (or has declared) the interest income and the tax deducted based on the certificate mentioned in Subparagraph aa),

b) is received from sources other than a payer, shall be established by the private individual in their tax return and shall be paid by the deadline prescribed for filing the tax return.

Pursuant to Section 65(2) of the PIT Act, the tax calculated with a rate of 15% shall be deducted, paid and declared by the payer. The private individual shall be entitled to determine by way of self-assessment that part of the purchase price of securities and the incremental costs associated with the securities that the payer did not take into account when determining the income, based on the payer's certificate issued for that purpose, which the payer shall also disclose to the tax authority.

When redeeming or transferring collective investment securities, the natural person has to pay social contribution tax on the basis of the amount taken into account as the base for personal income tax on interest income.

Pursuant to Government Decree No. 205/2023. (V. 31.), due to the altered application of Act LII of 2018 on Social Contribution Tax during the state of danger, starting from 1 July 2023 interest income earned by a *natural person* on the *redemption or transfer* of collective investment securities purchased/acquired after 30 June 2023 and *taken into account as the base for personal income tax (excluding interest income from units in real estate funds)* is also subject to a social contribution tax of 13 %, which, in line with the interest tax, is determined, deducted and paid by the payer to the state tax authority at the time of payment.

For the purposes of personal income tax, income earned under a long-term investment contract or a portfolio registered in a pension savings account, as well as income from the transfer of collective investment securities on a stock

exchange under the Capital Markets Act and on a stock exchange in any EEA or OECD member state, is not considered as an interest income and, therefore, these portfolios are not subject to Government Decree No. 205/2023. (V. 31.).

Incomes other than interest income

Under the effective PIT Act, Fund Units may be registered in the framework of certain schemes that offer a possibility for tax savings. Such an example is “income from long-term investment”, where the scheme provides tax exemption for the last day of the five-year term deposit, and a preferential 10% tax rate for the last day of the three-year term deposit. Another example is the retirement savings account which – subject to pre-defined conditions – has a state subsidy option and also provides tax-exempt retirement-type payment if the contract is terminated in the 10th year – or in the following tax year – after the eligibility for pension has been granted and the contract has been concluded. If the conditions are not met, the income acquired is subject to the tax liability prescribed by the PIT Act.

In the case of long-term investment contracts, the conversion (replacement) of securities in the term deposit register shall not be deemed the breaking of the term deposit if the converted (replaced) security or – should the private individual opt for claiming the portion of the funds to which they are entitled from the issuer of the security – the amount received in lieu of the security is included in the term deposit register within no later than 15 days of the conversion of the security or the payment of the amount.

In the case of retirement savings contracts, the conversion of securities shall preserve legal continuity – i.e. it will not be linked to the legal consequences that are associated with the payment of non-pension benefits (the assessment of other taxable income and the obligation to refund the pension subsidy) – if the investment service provider participating in the conversion or transformation transferred the successor securities to the private individual’s retirement securities account by the date defined in the transaction.

5.2.2 Taxation of non-resident private individuals

The tax liability of non-resident private individuals may be assessed in consideration of the national legislation of their tax residence and of a treaty – if any – between the country concerned and Hungary for the avoidance of double taxation (hereinafter: international treaty) if the private individual certifies their foreign tax residence and issues a declaration on whether they qualify as a beneficial owner in respect of the payment.

It is the non-resident private individual’s responsibility to provide (make available to the Fund) the certificate(s) required for the application of the tax rules of their tax residence (thus the English language tax residence certificate issued by the foreign tax authority for certifying the individual’s eligibility for tax exemption, the Hungarian translation thereof – or a copy of either of these documents –, and the beneficial owner declaration that may be required by the provisions of the international treaty).

If the tax deducted from a non-resident private individual is higher than the tax applicable based on the international treaty, they are entitled to reclaim the difference between the tax deducted and the tax payable in accordance with the international treaty at the General Tax Directorate of Priority Cases and Large Taxpayers (Kiemelt Adó és Vám Főigazgatóság) of the National Tax and Customs Administration by presenting a certificate on the tax deducted, and the documents required for the application of the international treaty (thus the English language tax residence certificate issued by the foreign tax authority for certifying the individual’s eligibility for tax exemption, the Hungarian translation thereof – or a copy of either of these documents –, and the beneficial owner declaration as required).

5.2.3 Tax payment by Hungarian institutional investors

In the case of tax payers subject to Act LXXXI of 1996 on Corporate and Dividend Tax, as amended several times, the exchange gain/loss arising from the distribution of fund units shall increase/reduce the tax base.

5.2.4 Taxation of non-resident institutional investors

The tax liability of non-resident institutional investors may be assessed in consideration of the national legislation of their country of incorporation and of a treaty – if any – between the country concerned and Hungary for the avoidance of double taxation.

II. Information related to the offering

6. OFFERING OF FUND UNITS

Not applicable.

III. Detailed information relating to participating organisations

7. INFORMATION RELATING TO THE FUND MANAGER

7.1 Name and legal form of the Fund Manager

The Fund Manager of the Fund is OTP Fund Management Ltd. Its legal form: private limited company.

7.2 Registered office of the Fund Manager

Registered office of the Fund Manager: H-1026 Budapest, Riadó u. 1–3.

7.3 Company registration number of the Fund Manager

The Fund Manager was registered by the Company Registry Court of the Budapest-Capital Regional Court under registration number Cg. 01-10-043959.

7.4 Date of incorporation of the Fund Manager

The Fund Manager was established on 18 September 1998 for an indefinite term through the transformation of OTP Investment Fund Management LLC.

7.5 Other investment funds managed by the Fund Manager

The list of other investment funds managed by the Fund Manager is included in Annex 3.

7.6 Indication of any other assets managed by the Fund Manager

As at 31 December 2022, the assets managed by the Fund Manager amounted to: HUF 1,869 billion.

7.7 Names and positions of the managers and members of the administrative, management and supervisory bodies of the Fund Manager, details of their main activities outside the company where these are of significance with respect to that company

The management body of the Fund Manager is the Board of Directors, which is composed of the following members:

Attila Bánfi, Chairman of the Board
György István Éder CEO,
Ferenc Csaba Bakk, BoD member,
István Honics, Deputy CEO for Investment Activity
Tibor Turner, General Deputy CEO

Attila Bánfi holds the position of Chairman of the Board under an agency agreement. György István Éder, as CEO of the Fund Manager, is head of the Fund Manager's work organisation, the person being in charge of the entire activity of the Fund Manager. István Honics and Tibor Turner, Members of the Board, are concurrently also members of the Fund Manager's work organisation, who – in addition to their mandate as executive officers – are employees holding different positions and responsibilities at the Fund Manager's work organisation (as indicated next to their names above) under an employment contract with the Fund Manager.

Offices held by the executive officers in other companies:

Attila Bánfi: Managing Director at OTP Bank Plc., Chairman of the Supervisory Board of OTP Invest DZU (Serbia), Board Member at OTP banka Srbija (Serbia) and Board Member at Budapest Stock Exchange Plc.,

György István Éder: Chairman of the Supervisory Board at DSK Asset Management AD (Bulgaria).
Tibor Turner: Member of the Supervisory Board of OTP Invest DZU (Serbia).

DSK Asset Management AD and OTP Invest DZU are foreign investment fund management companies where the Fund Manager holds ownership stakes.

Members of the Supervisory Board:

Domokos Takács (Chairman, OTP Bank Plc., Daily Banking Tribe Lead), László Vági, Dr. György Ádámosi.

7.8 Amount of the Fund Manager's subscribed capital

As at 31.12.2022, the subscribed capital of the Fund Manager amounted to: HUF 900 million, which has been paid up in full.

7.9 Shareholders' equity of the Fund Manager

As at 31.12.2022, the shareholders' equity of the Fund Manager amounted to HUF 16,816.807 million.

7.10 Number of employees of the Fund Manager

The Fund Manager employs 61 full-time staff members.

7.11 Indication of the specific tasks and functions which the Fund Manager is allowed to delegate to third parties

The Fund Manager may engage third parties for the more efficient discharge of its activities.

The Fund Manager engages third persons for performing the activities specified in Section 7(2)(a)(aa) of the Collective Investments Act [legal and accounting services] and for the performance of IT tasks. The latter, however, do not constitute outsourcing under Section 41(11)(b) of the Collective Investments Act, which provides that the provision of services which do not form part of investment fund management, including the provision of legal services, tax consulting services, delivery services, computer system development, computer system hosting and maintenance, the training and further development of personnel, billing services, payroll accounting and bookkeeping services, shall not be recognised as outsourcing.

7.12 Indication of companies to which investment management functions are delegated

At present, the Fund Manager does not engage any third party for the performance of the activity specified in Section 7(1)(a) of the Collective Investments Act [investment management (decisions relating to investment strategies and asset allocation exercises in connection with the investment policy, including the implementation thereof)].

7.13 A detailed description of the UCITS fund manager's remuneration policy (e.g. how remuneration and benefits are calculated, the persons responsible for determining remuneration and benefits, if there is a remuneration committee, the members of the remuneration committee)

The Fund Manager has a Remuneration Policy that is consistent with and promotes the application of sound risk management, and does not encourage risk taking that is inconsistent with the risk profile and management policies of the investment funds managed by the Fund Manager.

The Fund Manager, as a subsidiary of a Banking Group member subject to supervision consolidated with OTP Bank Plc., is also subject to the Bank Group Remuneration Policy and applies its relevant rules accordingly, without prejudice to the Fund Manager Remuneration Policy.

The Fund Manager's Supervisory Board – with the involvement of the Fund Manager's Remuneration Committee – decides on acceptance of the Remuneration Policy, and approval of its amendments, and oversees its implementation. Chairman of the Fund Manager's Remuneration Committee: Domokos Takács, members: Dr. György Ádámosi and László Vági.

The Board of Directors of the Fund Manager is responsible for the implementation and at least annual review of the Fund Manager's Remuneration Policy. In the context of the division of labour within the Board of Directors of the Fund Manager, the Chief Executive Officer of the Fund Manager shall be responsible for the tasks related to the implementation of the Fund Manager's Remuneration Policy, including the taking of any employer decisions in this scope.

7.14 Summary of the UCITS fund manager's remuneration policy

The Fund Manager Remuneration Policy covers the remuneration of officers and employees who, through their professional activities, have a material impact on the risk profile of the Fund Manager or the risk profile of the funds managed by the Fund Manager. The two main elements of the remuneration scheme are base remuneration (including basic salary and fringe benefits) and performance-based remuneration (including performance fee-based pay and non-performance fee-based pay).

The ratio between base remuneration and performance-based remuneration is differentiated for the various positions. The key principle of the Fund Manager's Remuneration Policy is to link the level of performance-based compensation — with preliminary and follow-up evaluation of risks — to the extent of achievement of Fund Manager, Group or individual targets. The payment of the performance-based remuneration conforms to the business cycle of OTP Bank Group and the Fund Manager.

7.15 A declaration by the UCITS fund manager that the detailed remuneration policy referred to in Section 7.13 is available via a website (with a link to the website provided) and that a hard copy is available on request

The detailed summary of the currently effective remuneration policy of the Fund Manager is available at the link below and is available in printed form at request:

<https://www.otpbank.hu/otpalapkezele/hu/Rolunk/Szabalyzatok>.
(The remuneration policy of OTP Fund Management)

8. INFORMATION CONCERNING THE DEPOSITARY

8.1 Name and legal form of the Depositary

The Depositary of the Fund is UniCredit Bank Hungary Zrt. Its legal form is private limited company.

8.2 Registered office of the Depositary

Registered office of UniCredit Bank Hungary Zrt.: H-1054 Budapest, Szabadság tér 5-6.

8.3 Company registration number of the Depositary

The company was registered under number 01-10-041348 by the Budapest Metropolitan Court as Court of Registration (currently: Company Registry Court of the Budapest-Capital Regional Court).

8.4 Main activity of the Depositary

UniCredit Bank Hungary Zrt. is a credit institution providing comprehensive banking services.

8.5 Scope of activities of the Depositary

The scope of activities of UniCredit Bank Hungary Zrt. is the following:

TEÁOR (NACE Rev. 2) No.:

64.19.'08. Other monetary intermediation

64.91.'08. Financial leasing

64.99.'08. Other financial service activities, except insurance and pension funding n.e.c.

66.12.'08. Security and commodity contracts brokerage

66.19.'08. Other activities auxiliary to financial services, except insurance and pension funding

66.22.'08. Activities of insurance agents and brokers

66.29.'08. Other activities auxiliary to insurance and pension funding

64.92.'08. Other credit granting

8.6 Date of incorporation of the Depositary

The date of foundation of UniCredit Bank Hungary Zrt.: 23.01.1990

8.7 Subscribed capital of the Depositary

As at 31 December 2022, the subscribed capital of UniCredit Bank Hungary Zrt. amounted to HUF 24,118 million.

8.8 Shareholders' equity of the Depository shown in the last financial report reviewed by an independent auditor

Consolidated shareholders' equity of UniCredit Bank Hungary Zrt. as at 31.12.2022: HUF 391,426 million.

8.9 Number of employees

As at 31.12.2022, UniCredit Bank Hungary Zrt. employed a total of 1,785 persons.

9. PARTICULARS OF THE AUDITOR

9.1 Name and legal form of the Auditor

The Fund's Auditor is Ernst & Young Könyvvizsgáló Korlátolt Felelősségű Társaság (company registration number : 01-09-267553, registered by the Company Registry Court of the Budapest-Capital Regional Court).

The person responsible for the audit: János Varga

The person responsible for the audit has declared that they meet the requirements set out in effective legislation, and that they possess the required expertise and experience in respect of financial institutions and have adequate liability insurance.

9.2 Registered office of the Auditor

H-1132 Budapest, Váci út 20.

9.3 Chamber registration number of the Auditor

Chamber of Hungarian Auditors registration number: 001165. CoHA membership ID number of the person responsible for the audit: 007319.

9.4 Name of the Auditor, if a natural person

Not applicable.

9.5 Address of the Auditor, if a natural person

Not applicable.

9.6 Chamber registration number of the Auditor, if a natural person

Not applicable.

10. INFORMATION CONCERNING THE ADVISERS WHO GIVE ADVICE UNDER CONTRACT WHICH IS PAID FOR OUT OF THE ASSETS OF THE FUND

Not applicable.

11. INFORMATION CONCERNING THE DISTRIBUTORS

11.1 Name and legal form of the Principal Distributor of the Fund

The Principal Distributor of the Fund is OTP Bank Plc. Its legal form: public company.

11.2 Registered office of the Principal Distributor

The registered office of OTP Bank Plc.: H-1051 Budapest, Nádor u. 16.

11.3 Company registration number of the Principal Distributor

The company was registered under number 01-10-041585 by the Budapest Metropolitan Court as Court of Registration (currently: Company Registry Court of the Budapest-Capital Regional Court).

11.4 Scope of activities of the Principal Distributor

The scope of activities of OTP Bank Plc. is the following:

TEÁOR (NACE Rev. 2) No.:

6419 Other monetary intermediation

6491 Financial leasing

6619 Other activities auxiliary to financial services except insurance and pension funding n.e.c.

6499 Other financial service activities, except insurance and pension funding n.e.c.

6612 Security and commodity contracts brokerage

6629 Other activities auxiliary to insurance and pension funding

11.5 Date of incorporation of the Principal Distributor

OTP Bank Plc. was incorporated on 31 December 1990 as the legal successor of Országos Takarékpénztár (National Savings Bank) established in 1949.

11.6 Subscribed capital of the Principal Distributor

The share capital of OTP Bank Plc. is HUF 28,000,001,000.

11.7 Shareholders' equity of the Principal Distributor shown in the last financial report reviewed by an independent auditor

Consolidated shareholders' equity of OTP Bank Plc. as at 31.12.2022: HUF 3,322,312 million

11.8 Means of forwarding to the Fund Manager the particulars taken by the Distributor of investors and their representatives

Pursuant to Section 106(1) of the Collective Investments Act, the Principal Distributor is required to disclose to the Fund Manager the particulars of investors and their representatives recorded by the Principal Distributor, where this is permitted by the Prospectus or the Fund Management Policy, and if so agreed between the Principal Distributor and the Fund Manager. Such data transfer, which is permitted by this provision of the Prospectus, shall not constitute a breach of the securities secret or business secret under the Capital Market Act. The Fund Manager shall be allowed to use the data received as described above solely within the framework of the provisions relating to securities secrets, for the purposes of investment fund management activities, in particular, for the provision of information to investors, and for the marketing communication of the Fund Manager or the Fund.

11.9 Co-distributors of the Fund**UniCredit Bank Hungary Zrt.:**

Registered office: H-1054 Budapest, Szabadság tér 5-6.

Company registration number: 01-10-041348

Date of incorporation: 23 January 1990

Scope of activities:

64.19.'08. Other monetary intermediation

64.91.'08. Financial leasing

64.99.'08. Other financial service activities, except insurance and pension funding n.e.c.

66.12.'08. Security and commodity contracts brokerage

66.19.'08. Other activities auxiliary to financial services, except insurance and pension funding

66.22.'08. Activities of insurance agents and brokers

66.29.'08. Other activities auxiliary to insurance and pension funding

64.92.'08. Other credit granting

Subscribed capital: HUF 24,118 billion

Equity as at 31.12.2022: HUF 391,426 million

Concorde Értékpapír Zrt.

Registered office: H-1123 Budapest, Alkotás u. 50.

Company registration number: 01-10-043521

Date of incorporation: 30 June 1997.

Scope of activities: 6523 '03 Other financial service activities, except insurance and pension funding
n.e.c.
7414 '03 Management consultancy activities
6712 '03 Security contracts brokerage, fund management
Subscribed capital: HUF 1 billion
Equity as at 31.12.2022: HUF 7,647 million

Raiffeisen Bank Zrt.:

Registered office: H-1133 Budapest, Váci út 116–118.
company registration number: 01-10-041042
Date of incorporation: 10 December 1986
Scope of activities: 64. 19'08: Other monetary intermediation (core activity)
Subscribed capital: HUF 50 billion
Equity as at 31.12.2022: HUF 351,853 million

SPB Befektetési Zrt.:

Registered office: H-1051 Budapest, Vörösmarty tér 7-8.
Company registration number: 01-10-044420
Date of incorporation: 11 August 2000
Scope of activities: 6712 Security and commodity contracts brokerage
Subscribed capital: HUF 500 million
Equity as at 31.12.2022: HUF 447,711 million

DSK Bank EAD – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: 1036 Sofia, 19 Moskovska St., Bulgaria
Company registration number: No 756/1999 - 121830616
Date of incorporation: 26 January 1999
Scope of activities: Other monetary intermediation
Subscribed capital: BGN 1329 million
Equity as at 31.12.2022: BGN 3704 million

Nova KBM d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: Ulica Vita Kraigherja 4, 2000 Maribor, Slovenia
Company registration number: No 5860580000
Date of incorporation: 27 July 1994
Scope of activities: K 64.190: Other monetary intermediation
Subscribed capital: EUR 150 million
Equity as at 31.12.2022: EUR 998 million

OTP banka d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: Split, Domovinskog rata 61., Croatia
Company registration number: No 060000531
Date of incorporation: 17 May 1957
Scope of activities: 64.19: Other monetary intermediation
Subscribed capital: EUR 539 million
Equity as at 31.12.2022: EUR 938 million

12. INFORMATION CONCERNING THE REAL ESTATE APPRAISER

Not applicable.

13. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Phone number of the Fund Manager: +36 (1) 412 8300, fax: +36 (1) 412 8399, email: levelek@otpalap.hu

14. DECLARATION

OTP Fund Management Ltd. (registered office: H-1026 Budapest, Riadó u. 1-3, company registration number: 01-10-043959, registered by the Company Registry Court of the Budapest-Capital Regional Court) as Fund Manager acting on behalf of the OTP EUR Short Bond Fund issuing the Fund Units and OTP Bank Plc. (registered office: H-1051 Budapest, Nádor utca 16, company registration number: 01-10-041585, registered by the Company Registry Court of the Budapest-Capital Regional Court) as Principal Distributor hereby declare that the data and statements contained in this Prospectus are true to facts and do not conceal any facts or data that are relevant to the assessment of the securities concerned and the particular situation of the Issuer. The Issuer and the Principal Distributor shall be jointly and severally liable to holders of the Fund Units for any damages arising from any misleading information contained in the Prospectus or from the withholding of information.

Budapest, 14 March 2024

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Gergely Balázs Szarka Tímea Ujvári	Domokos Takács Rita Fabriczki
OTP Alapkezelő Zrt.	OTP Bank Plc.
on behalf of OTP Fund Management Ltd. and OTP EUR	on behalf of the Principal Distributor of OTP EUR Short
Short Bond Fund as Issuer	Bond Fund

ELECTRONICALLY SIGNED DOCUMENT

FUND MANAGEMENT POLICY

I. Particulars of the Fund

1. BASIC DETAILS OF THE FUND

1.1 Name of the Fund

OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
Name used for distribution abroad: OTP EUR Short Bond Fund

1.2 Concise name of the Fund

OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
Name used for distribution abroad: OTP EUR Short Bond Fund

1.3 Registered office of the Fund

H-1026 Budapest, Riadó u. 1–3.

1.4 Date of registration and registration number of the Fund

The Fund was registered on 18 December 2001; number of the resolution ordering its registration: III./110.178-1/2001., registration number of the Fund: 1111-118.

1.5 Name of Fund Manager

The Fund Manager of the Fund is OTP Fund Management Ltd.

1.6 Name of Depositary

The Depositary of the Fund is UniCredit Bank Hungary Zrt.

1.7 Name of Distributor

1.7.1 Principal Distributor:

OTP Bank Plc.

1.7.2 Co-distributors:

UniCredit Bank Hungary Plc, Concorde Securities Plc., Raiffeisen Bank Plc., SPB Investment Plc.

DSK Bank EAD – Continuous distribution of the Fund Units commences after passporting of the Fund.

Nova KBM d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

OTP banka d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund

1.8 Form of operation of the Fund, scope of possible investors

Form of operation of the Fund: public fund.

In Hungary, the Fund Units issued by the Fund can be purchased by resident and, with the exception of US nationals, non-resident natural and legal persons (series “I” Fund Units are only available to Professional Investors contacted by the Fund Manager) provided that they comply with the rules defined in the terms and conditions of the offering.

Based on the scope of potential investors – in line with the concept system applied in Section 67(1)(b) of the Collective Investments Act –, the Series “A” Fund Units can be defined as Fund Units offered to retail investors; this, however, should not be understood as a limitation of the scope of investors as indeed, Series “A” Fund Units can be purchased by both retail and professional investors.

As regards the series “I” Fund Units, the scope of eligible investors during primary distribution is limited to Professional Investors contacted by the Fund Manager.

1.9 Type of the Fund

Open-end

1.10 Maturity of the Fund

Unfixed

1.11 Harmonisation of the Fund

An investment fund authorised by the Supervisory Authority and harmonised in accordance with the UCITS Directive.

1.12 Number and description of any series issued by the Fund, showing the differences between each series

The Fund has issued two series, marked “A” and “I”.

The nominal value of Series “A” and “I” Fund Units is EUR 0.01 each, their Currency of Issue and Settlement is the euro.

Type of the Fund Units: registered, their form of creation: dematerialised form.

The Fund Unit series are different from each other:

in respect of the scope of eligible buyers during the primary distribution:

There are no restrictions concerning the scope of investors in respect of the Series “A” Fund Units issued by the Fund; all persons having a legal-entity status in compliance with the rules of the jurisdiction applicable at the relevant point of sale and complying with the rules set out in the terms and conditions of distribution may purchase the Fund Units. In Hungary, Fund Units can be purchased by resident and non-resident natural and legal persons – except US citizens – as well as unincorporated businesses.

The marketability of “I” series Fund Units is limited; they can be purchased exclusively by Professional Investors invited by the Fund Manager.

- in respect of the level of fees and commissions charged:

The three series differ from each other in respect of the fund management fee paid by the Fund to the Fund Manager and in respect of the sale and redemption commissions charged during the period of continuous distribution.

- in respect of Points of Sale:

In the course of primary distribution, Series “A” Fund Units are available at the Points of Sale specified in Annex 2.a, and series “I” Fund Units are available at the Points of Sale specified in Annex 2.b.

As the Fund Units are dematerialised, during their continuous distribution contracts for their sale and purchase shall only be concluded with persons who have entered into a securities account management contract with the Distributor acting in the relevant distribution and specified the identification details of their account manager and securities account number therein.

1.13 Primary category of assets in which the Fund may invest

Securities fund.

1.14 Capital or yield guarantee, capital or yield protection applicable to the Fund

Not applicable.

2. OTHER BASIC INFORMATION ON THE FUND

Cross-border marketing: After passporting and obtaining marketing authorisation for the Fund, the Fund Units also become available abroad (in another EEA State or a third country). The special terms and conditions of cross-border marketing are highlighted in the appropriate sections of this Fund Management Policy.

3. LIST OF REGULATIONS ON INVESTMENT FUND MANAGEMENT, ON THE OFFERING AND DISTRIBUTION OF FUND UNITS, AND OF THE LAWS GOVERNING THE RELATIONSHIP BETWEEN THE FUND AND THE INVESTORS

The Fund, the Fund Manager, the Depositary, the Principal Distributor and all other persons indicated in the Prospectus and in the Fund Management Policy as participating organisations, as well as the legal relationship between such persons and the Fund or the Fund Manager are subject to Hungarian law (including directly applicable legislative acts of the European Union).

The special regulations on investment fund management, on the offering and distribution of fund units, and the laws governing the relationship between the fund and the investors are listed below:

(a) Investment fund management, the operation of the investment fund and the investment fund manager and the legal relationship between the fund and the investors are subject to:

- Act XVI of 2014 on Collective Investment Trusts and their Managers and Amending Certain Finance Related Acts (“Collective Investments Act”);
- Government Decree No. 79/2014 (III. 14.) on the structural organisation, conflict of interest, conduct of business and risk management requirements of UCITS managers;
- Government Decree No. 78/2014 (III. 14.) on the investment and borrowing policies of collective investment trusts;
- Government Decree No. 156/2023 (IV. 27.) on the investment rules of certain investment funds,
- Government Decree No. 89/2023 (III. 22.) on economic/financing measures;
- Act CXX of 2001 on the Capital Market (“Capital Market Act”)
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers and on the Regulations Governing their Activities (“Investment Firms Act”);

(b) The offering and distribution of investment fund units are subject to:

- Act XVI of 2014 on Collective Investment Trusts and their Managers and Amending Certain Finance Related Acts (“Collective Investments Act”);
- Act CXX of 2001 on the Capital Market (“Capital Market Act”)
- Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers and on the Regulations Governing their Activities (“Investment Firms Act”).

In addition to the regulations listed above, any other regulations to which the regulations listed above refer shall also be applicable, along with regulations at lower levels of the legal source hierarchy issued pursuant to the authorisations included in the legislation listed above.

As regards the latter, the most notable regulation applicable to the offering and distribution of fund units is Government Decree No. 284/2001 (XII. 26.) on the mode of the generation and transfer of dematerialised securities and the relevant safety requirements, and on the opening and management of securities accounts, central securities accounts and customer accounts.

The investment fund and the fund manager are supervised by the Magyar Nemzeti Bank, the legal status, duties, procedures, organisation and financial management of which are regulated in Act CXXXIX of 2013 on the Magyar Nemzeti Bank.

Through the rules applicable to the supervisory fee imposed on the investment fund, the operation of the investment fund is also affected by MNB Decree No. 17/2018 (V. 29.) on the method and terms of the payment and calculation of the supervisory fee.

General regulations on securities are included in Act V of 2013 on the Civil Code (“Civil Code”).

In addition, applicable legal regulations include the following legal act of the European Union:

The amended Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 (UCITS V Directive)

Commission Delegated Regulation (EU) No. 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU of the European Parliament and of the Council with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision (AIFM Regulation).

Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012;

Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector;

Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

The text of the above mentioned regulations is also available electronically at:

<https://www.mnb.hu/felugyelet/szabalyozas/jogszabalyok>

The text of the Hungarian legislation in effect is available in full on the following website: Jogszabálykereső (Magyarország.hu)

4. A DESCRIPTION OF THE MAIN LEGAL IMPLICATIONS OF THE INVESTMENT, INCLUDING INFORMATION ON JURISDICTION AND THE APPLICABLE LAW

The rights of investors are discussed in detail in Section 10 of the Fund Management Policy.

By acquiring the Fund Units, the investor accepts that the relationship between the Fund and the investor is subject to the provisions of Hungarian law, and through the Hungarian legislation, the provisions of the legal acts of the European Union directly applicable in Hungary. In respect of the relationship between the Fund and the investor and any debate or dispute arising therefrom, the Parties subject themselves to the regular Hungarian court with competence as per the rules on competence and jurisdiction in effect under Hungarian law.

The recognition and enforcement of the judgements of Hungarian courts are governed by the Hungarian regulations in effect and the applicable legal acts of the European Union; thus, in particular, Regulation (EU) No 1215/2012 of the European Parliament and of the Council of 12 December 2012 on jurisdiction and the recognition and enforcement of judgements in civil and commercial matters.

II. Information on the Fund Units (separately for each series)

5. ISIN CODE OF THE FUND UNITS

The Fund issues two Fund Units series in a dematerialised form. ISIN code of Series “A” Fund Units: HU0000702162. ISIN code of Series “I” Fund Units: HU0000732771.

6. NOMINAL VALUE OF THE FUND UNITS

The nominal value of Series “A” and “I” Fund Units is EUR 0.01 each.

7. CURRENCY OF THE FUND UNITS

The currency of series “A” and “I” Fund Units is the euro.

8. MODE OF PRODUCTION OF THE FUND UNITS, INFORMATION RELATING TO ISSUE AND MARKETING

Mode of production of the Fund Units issued by the Fund: dematerialised securities.

Dematerialised securities:

Pursuant to Section 5(1)29 of the Capital Market Act and for the purposes of other legal regulations implemented by the authorisation thereof, dematerialised securities are electronic instruments identifiably containing all material information of securities, which are recorded, transmitted and registered electronically.

9. MEANS OF PROOF AND REGISTRATION OF OWNERSHIP OF THE FUND UNITS

Pursuant to Section 6:569(7) of the Civil Code, for the transfer of dematerialised securities, a contract or another legal title of transfer, the charging of the transferor's securities account and the crediting of the dematerialised securities to the new holder's securities account shall be required. Pursuant to Section 138(1) of the Capital Market Act, whenever title to dematerialised securities is transferred, it must take place through debiting and crediting securities accounts. Pursuant to Section 6:570 of the Civil Code, the rights represented by the securities shall pass to the new holder of the securities upon the transfer of the securities, irrespective of whether the transferor had those rights or not.

Pursuant to Section 6:566(6) of the Civil Code and Section 138(2) of the Capital Market Act, unless proven to the contrary, the holder of dematerialised securities shall be considered the holder of the securities account on which the dematerialised securities are registered. The account statement issued by the keeper of the securities account evidences ownership of the dematerialised securities to third parties as effective on the statement date. Account statements do not constitute securities; they are not transferable and cannot be redeemed by endorsement.

The Fund Units are dematerialised, i.e. they are issued in the form of computer signs; therefore, they cannot be printed.

10. RIGHTS OF INVESTORS EMBODIED IN THE FUND UNITS

In terms of treatment, the Fund Manager shall not discriminate between investors; each investor shall receive the same fair treatment.

Series "A" and "I" Fund Units do not differ in terms of the rights attached to the Fund Units, however, both Series differ in terms of the scope of those entitled to purchase them in the course of primary distribution, and the fees and commissions charged and the Points of Sale.

The holder of the Fund Unit shall be entitled to

- give an order to the Distributor to redeem their Fund Units at the net asset value per Unit determined for the specific series, less the redemption commission, on the Trading Day, during Trading Hours at any of the Points of Sale;
- be informed of the redemption/sales commission prior to purchasing/redeeming the Fund Units;
- receive free of charge, when purchasing the Fund Unit for the first time, the Fund's Information Notice (Prospectus), the Fund Management Policy and the Key Information Document, and to have the Fund's most current annual and semi-annual reports made available free of charge upon request;
- receive free of charge upon request, during the continuous distribution of the Fund Units, the Fund's Key Information Document, the Prospectus, the Fund Management Policy, the annual and semi-annual reports and the most current portfolio report, and to be informed during verbal and electronic sales of the locations where the documents listed are available;
- transfer, as Owner of the series "I" Fund Units, the Fund Units to another investor in the Professional Investors category;
- receive a share of the distributable equity of the Fund if the Fund is terminated, as per Section 50 of the Fund Management Policy;
- view the business regulations of the Fund Manager and the proceeding Distributor;
- have access to the regular and extraordinary information specified in the Collective Investments Act at the publication sites defined in the Prospectus and at the Points of Sale.

- view the termination report after the termination of the Fund; and
- exercise any other rights defined by law and in the Fund Management Policy.

III. Investment policy and objectives of the Fund

11. DESCRIPTION OF THE FUND'S INVESTMENT OBJECTIVE AND SPECIALISATION, INCLUDING ITS FINANCIAL OBJECTIVES

The purpose of the Fund is to offer flexible investment products for investors with funds available for at least 12 months. The Fund Manager integrates sustainability risks and their management in the Fund's decision making processes; accordingly, the Fund is in line with Article 6 of the SFDR Regulation.

The Fund does not aim to promote environmental and/or social characteristics (does not fall within the scope of Article 8(1) of the SFDR Regulation) or make sustainable investments (does not fall within the scope of Article 9(1), (2) and (3) of the SFDR Regulation).

12. INVESTMENT STRATEGY, INVESTMENT TECHNIQUES TO IMPLEMENT THE FUND'S OBJECTIVES

To accomplish the objective of the Fund, the Fund Manager invests most of the Fund's assets in government securities, some of them in corporate bonds. The Fund Manager can also execute derivative transactions in order to mitigate the interest risk and optimise currency risk.

Benchmark Index: 80% ICE BofaML 0-1Y All Euro Gov (EAAS)+20% ICE BofaML 1-3Y All Euro Gov (E1AS)

The Benchmark Index components are included in the public register maintained by ESMA as specified in Article 36 of Regulation (EU) 2016/1011 of the European Parliament and of the Council on indices used to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014.

The Fund invests at least 80% in assets issued and traded outside of Hungary.

13. CATEGORIES OF ASSETS IN WHICH THE FUND IS AUTHORISED TO INVEST, WITH AN INDICATION WHETHER THE FUND IS AUTHORISED TO CONDUCT TRANSACTIONS IN FINANCIAL DERIVATIVE INSTRUMENTS

Government securities and securities guaranteed by the state

Government securities are debt securities issued by the European Union, a Member State of the European Union – including the government department, agency or special purpose vehicle thereof –, in the case of federal Member States, a Member of the Federation, a special purpose vehicle for several Member States, an international financial institution established by two or more Member States which has the purpose of mobilising funding and provide financial assistance to the benefit of its members that are experiencing or threatened by severe financing problems, or by the European Investment Bank.

Bank deposits (demand deposits or time deposits)

In order to ensure the Fund's liquidity or in cases where the Fund is unable to properly invest its uncommitted capital into securities, the Fund Manager is entitled to deposit the Fund's uncommitted capital at credit institutions in demand deposits or in deposits that are redeemable at notice, provided that the registered office of the credit institution is in a Member State of the European Union or, if the credit institution's registered office is not in a Member State, it is subject to prudential rules which, in the opinion of the Supervisory Authority, are equivalent to the provisions set out in Union legislation.

Securities financing transactions

Repurchase and reverse repurchase transactions

A repurchase and a reverse repurchase transaction means any agreement for the transfer of securities or guaranteed rights relating to title to securities where the guarantee is issued by a recognised exchange which holds the rights to the securities and the agreement does not allow the seller to transfer or pledge a particular security to more than one counterparty at a time, and also contains a commitment of the seller to repurchase

and a commitment of the buyer to resell the given securities – or securities of the same type substituting the given securities – at a specified price on a future date specified, or to be specified, by the transferor. Such transaction shall be regarded as a repurchase agreement for the person selling the securities and a reverse repurchase agreement for the person buying them.

Buy-sell back and sell-buy back transactions

A buy-sell back or a sell-buy back transaction means a transaction by which a counterparty buys or sells securities or guaranteed rights relating to title to securities agreeing, respectively, to sell or to buy back securities or guaranteed rights of the same description at a specified price on a future date; that transaction shall be regarded a buy-sell back transaction for the counterparty buying the securities or guaranteed rights, and a sell-buy back transaction for the counterparty selling them.

Securities lending and securities borrowing

A transaction where the counterparty transfers securities to a borrower with the commitment of the borrower to return the same securities on demand or at a pre-specified future date; for the counterparty transferring the securities the transaction is a securities lending transaction, and for the counterparty receiving the securities, it is a securities borrowing transaction.

Mortgage bonds and other secured bonds

In addition to Hungarian mortgage bonds issued publicly in accordance with Act XXX of 1997 on Mortgage Banks and Mortgage Bonds, the Fund can also purchase mortgage bonds publicly issued by foreign mortgage banks as well as other secured bonds.

Other debt securities, financial market instruments, structured bonds

Compared to government securities – depending on the guarantees associated with them –, bonds, money market instruments and structured bonds issued by other organisations (e.g. economic operators, credit institutions, municipalities and other institutions) represent a higher risk level.

Investment units issued by other investment funds and other collective investment securities

The Fund shall be permitted to include fund units and other collective securities in its portfolio, subject to the limitations specified in Section 15 of the Fund Management Policy.

Other bond type securities issued abroad

According to their own legislation, foreign countries can issue securities that have no Hungarian equivalent. The Fund Manager can purchase such securities for the Fund, provided that the limitations applicable to its investment policy are observed.

Shares

Shares are securities representing membership rights and ownership stakes in a company limited by shares.

Foreign currency

The Fund Manager may invest the assets of the Fund in instruments denominated in foreign currencies, currency pairs or derivatives for such instruments.

Derivative instruments

A derivative contract is a transaction whose value depends on the value of the underlying investment instrument, foreign exchange, or reference rate (underlying instrument) and which may itself be traded.

Eligible derivative instruments:

Derivative financial instruments traded on regulated markets, including equivalent cash-settled instruments and non-standardised derivative financial instruments traded over the counter (OTC derivative contracts), provided that:

- a) the underlying instruments of such OTC derivative contracts are eligible instruments, or financial indices, interest rates, exchange rates or currencies in which the Fund is permitted to invest in accordance with its investment objectives laid down in the Fund Management Policy;
- b) the counterparties to such OTC derivative contracts are institutions subject to prudential supervision and classified into the categories authorised by the Supervisory Authority, and
- c) the reliable and verifiable daily valuation of such OTC derivatives is ensured and, at the Fund's initiative, the contracts can be sold, liquidated or closed by an offsetting transaction at any time at their fair market value.

14. HIGHEST AND LOWEST SHARE OF SPECIFIC ASSETS AUTHORISED IN A PORTFOLIO, OR THE PROPOSED SHARE THEREOF

In respect of the highest and lowest share of specific portfolio elements, the Fund applies the limits included in prevailing legislative provisions; thus, in particular, in Government Decree No. 78/2014 (III. 14.) – it does not undertake limitations that are more stringent by comparison. This section is designed to present envisaged target shares that do not imply a limitation and that are expected during the implementation of the Fund’s investment strategy and daily operation.

Target shares planned to be applied by the Fund as a percentage of the aggregate asset value	Planned minimum	Planned maximum
Investment instruments		
• Term deposits	0%	40%
Investments in bond-type instruments		
• Government securities and securities guaranteed by the state	0%	100%
• Mortgage bonds and other secured bonds	0%	40%
• Other debt securities	0%	40%
Shares		
• Listed shares	0%	20%
Collective investment securities		
• Collective investment securities, including	0%	25%
• Funds managed by OTP Fund Management Ltd. (group)	0%	25%
Miscellaneous information		
Derivative instruments (absolute value of the netted notional amount of derivative transactions to net asset value)		
• Stock market	0%	20%
• Bond market	0%	100%
• Interest-type	0%	100%
• Forex	0%	60%
Foreign exchange risk		
• Net foreign currency position other than base currency	0%	15%
Instruments providing the Fund’s liquidity		
• Demand deposits	0%	40%
• Absolute value of the exposure value of securities financing transactions	0%	100%

15. DESCRIPTION OF ANY LIMITATIONS ON THE INVESTMENT POLICY AND AN INDICATION OF ANY TECHNIQUES AND INSTRUMENTS OR BORROWING POWERS WHICH MAY BE USED IN THE MANAGEMENT OF THE FUND, INCLUDING AGREEMENTS FOR THE USE, LIMITATION, REUSE OF GUARANTEES AND ASSETS AND THE MAXIMUM LEVEL OF LEVERAGE THAT MAY BE USED

The Fund Manager may conclude contracts on behalf of the Fund for possible components of the portfolio only if they do not infringe upon the limits listed below.

Compliance with the investment rules defined in the table below must be achieved at the time of purchase, with a view to the market value of the various portfolio components on the transaction date as compared to the Fund's equity on that date.

	Limit per asset	Maximum ratio within the OTP EUR Short Bond Fund portfolio
1.	Investment in transferable securities or money market instruments issued by the same issuer by default	10%

2.	The total value of transferable securities and money market instruments of issuers where the value of investments by the fund individually exceeds 5% of the assets of the fund	40%
3/a.	The fund's exposure to counterparty risk based on an OTC derivative contract in the case of a non-credit institution	5%
3/b.	The fund's exposure to counterparty risk based on an OTC derivative contract in the case of a credit institution	10%
4.	Aggregated share of points 1, 3 and 9 towards a counterparty	20%
5.	Maximum share of mortgage bonds issued by an issuer that has its registered office in Hungary and covered bonds issued by an issuer that has its registered office in another EEA country	25%
6.	The total maximum share of mortgage bonds if concentration towards individual issuers exceeds 5%	80%
7.	Maximum share of an issuer if the transferable securities or money market instruments are issued or are guaranteed by an EEA Member State, a local authority thereof, a third country or a public international body to which one or more EEA Member States belong	35%
8.	Maximum share of an issuer if the transferable securities or money market instruments are issued or are guaranteed by an EEA Member State, a local authority thereof, a third country or a public international body to which one or more EEA Member States belong and the concentration of investment in a series does not exceed 30% and the fund has invested in at least 6 different series	100%
9.	Maximum share of the same credit institution's deposits	20%
10.	Combined share of points 4 and 9	35%
11.	Maximum share of a specific collective investment instrument	10%
12.	Maximum level of leverage	double
13.	Maximum share of securities and financial instruments not listed separately among the eligible instruments	10%

*netted risk exposure: the netted risk exposure existing in the individual instruments of the Fund shall be established by adding the current value of the given asset to the value of the exposure existing in the derivative transactions based on the same instrument, in a way that the exposure on opposite transactions shall be netted against each other. For the purpose of complying with the limit concerning the total net risk exposure of the Fund, the derivative transactions concluded for the purpose of hedging currency risks existing in the instruments of the Fund may be ignored.

- Average Remaining Maturity Ratio: maximum 2 years.
- The Fund is not required to comply with the investment limits listed in this chapter when exercising subscription rights attaching to negotiable securities and money market instruments held by it or when the limits are exceeded for reasons beyond the Fund's control. In the event of such breaches of the limits, the Fund shall restore compliance with the limits in its sales transactions – taking due account of the interests of its investors – as soon as possible but no later than within 90 days.
- The Fund Manager may not invest its own capital in the Fund Units issued by the Fund.
- The Fund invests at least 80% in assets issued and traded outside of Hungary.
- Until 1 April 2024, the Fund Manager may not purchase debt securities issued by the central bank of another EU Member State, denominated in forint.
- Moreover, the Fund Manager shall comply at all times with any other investment limitations set out in the Collective Investments Act, in Government Decree No. 78/2014 (III. 14.) and in any other legislation in effect.
- The Fund's annual and semi-annual reports contain the information as set out in Section XI of Annex 6 to the Collective Investments Act on leverage as well as the right to reuse guarantees provided under the collateral or the leveraging agreement.

16. CURRENCY IN WHICH THE PORTFOLIO EXPOSURE IS DENOMINATED

The Fund Manager manages the Fund's currency exposure actively. Where the Fund Manager deems it appropriate, it may completely eliminate the foreign exchange risk arising from instruments denominated in foreign currencies by way of forward currency sales, but it may also undertake open foreign currency positions at its discretion. Accordingly, the Fund's net foreign currency exposure may vary between 0% and 15%.

17. DESCRIPTION OF THE INVESTMENT POLICY ENSURING THE PROTECTION OF CAPITAL AND YIELDS AND THE UNDERLYING TRANSACTIONS ENVISAGED

Not applicable.

18. BORROWING POLICIES

The amount of the loans borrowed by the Fund at a maturity of less than 3 months may not exceed 10 percent of its assets. The Fund is entitled to pledge collateral for the borrowing. The Fund may not issue bonds or any other debt securities. Deferred payment arrangements provided by the Distributor for up to 15 days for a payment obligation by the Fund shall not constitute borrowing.

The Fund may not provide loans or guarantees. This restriction does not apply to the purchase of financial instruments that have not been fully paid.

The Fund is entitled to pledge collateral for its derivative transactions deriving their value from the Fund's assets. The valuation terms of assets transferred as collateral are included in Section 27 of the Fund Management Policy.

The Fund may lend or borrow securities in the framework of securities lending/borrowing transactions provided that they do not exceed 30% of the value of its assets in total.

19. THE STATES, LOCAL AUTHORITIES OR PUBLIC INTERNATIONAL BODIES ISSUING OR GUARANTEEING SECURITIES IN THE SECURITIES OF WHICH THE FUND INTENDS TO INVEST MORE THAN 35 PERCENT OF ITS ASSETS

With permission from the MNB, the Fund may invest up to 100 percent of its assets in securities issued or guaranteed by an EEA or OECD member state or in debt securities issued or guaranteed by an international financial institution, provided that not more than 30 percent of its assets may be invested in securities of a given series and it invests in at least 6 different series.

The 35% exposure for the assets in the Fund may be exceeded when investing in securities issued by the following issuers:

- France
- Germany
- Italy
- Spain
- Hungary
- Romania
- European Union
- European Stability Mechanism

20. DESCRIPTION OF THE REPLICATED INDEX AND THE MAXIMUM LEVEL OF DEVIATION FROM THE INDEX-WEIGHTED AVERAGE OF SECURITIES

Not applicable.

21. THE INVESTMENT POLICY OF THE INVESTMENT FUND IN WHICH AN INVESTMENT FUND INVESTING IN OTHER INVESTMENT FUNDS PLANS TO INVEST MORE THAN 20 PERCENT OF ITS ASSETS

Not applicable.

22. DESCRIPTION OF THE TARGET UCITS AND ITS INVESTMENT COMPARTMENT, DESCRIPTION OF THE MASTER AIF, INFORMATION ON WHERE ANY MASTER AIF IS ESTABLISHED

Not applicable.

23. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Not applicable.

24. INFORMATION RELATED TO DERIVATIVE TRANSACTIONS

24.1 Information on whether the derivative transactions are carried out for hedging purposes or for the implementation of investment objectives

The Fund uses derivative instruments for hedging purposes and for the efficient development of the portfolio. Transactions concluded for hedging purposes reduce the Fund's exposure to foreign currency or other instruments. With the use of positions taken for the efficient development of the portfolio, we undertake a market exposure through derivative instruments, which may increase the risk of the portfolio through the risk of default associated with derivative contracts.

24.2 Potentially targeted derivative instruments or derivative transactions

Eligible derivative instruments:

Derivative financial instruments traded on regulated markets, including equivalent cash-settled instruments and non-standardised derivative financial instruments traded over the counter (OTC derivative contracts), provided that:

- a) the underlying instruments of such OTC derivative contracts are eligible instruments, or financial indices, interest rates, exchange rates or currencies in which the Fund is permitted to invest in accordance with its investment objectives laid down in the Fund Management Policy;
- b) the counterparties to such OTC derivative contracts are institutions subject to prudential supervision and classified into the categories authorised by the Supervisory Authority, and
- c) the reliable and verifiable daily valuation of such OTC derivatives is ensured and, at the Fund's initiative, the contracts can be sold, liquidated or closed by an offsetting transaction at any time at their fair market value.

24.3 Indication of the specific statute under which the Fund exercised any derogation option

Not applicable.

24.4 Investment limits governing derivative transactions

The Fund may conduct derivative transactions under the following terms:

- a) the derivative contract is concluded for hedging purposes or for the efficient management of the portfolio;
- b) The total netted risk exposure of the Fund – including those associated with derivative transactions – must not exceed twice its net asset value. Total netted risk exposure means the sum of the absolute values of the netted risk exposures existing in the individual instruments of the Fund. The netted risk exposure existing in the individual instruments of the Fund shall be established by adding the current value of the given asset to the value of the exposure existing in the derivative transactions based on the same instrument, in a way that the exposure on opposite transactions shall be netted against each other. For the purpose of complying with the limit concerning the total netted risk exposure of the Fund, the derivative transactions concluded for the purpose of hedging currency risks existing in the instruments of the Fund may be ignored.
- c) The netted risk exposure of the Fund existing in the individual instruments shall not exceed the investment limits specified for the given instrument in Government Decree No. 78/2014. (III.14.) or in the Fund Management Policy.

When applying this rule, the index-linked derivative transactions need not be considered; however, it should always be considered if a transferable security or money market instrument also contains derivative transactions based on the given instrument.

24.5 Netting rules for positions held in specific instruments

The investment limits listed in Section 15 of the Fund Management Policy shall refer to the net position of individual securities as follows:

- net position of currencies, securities representing identical rights, and of forward transactions for the same currency or investment instruments and for the same maturity, options and option warrants shall mean the difference between long (short) positions of the investment instrument as opposed to short (long) positions;
- the investment fund manager may offset the fund's long (short) non-derivative positions in currencies or investment instruments by short (long) derivative positions in the same currencies or investment instruments, as well as the long and short derivative positions in the same assets against one another;
- positions in the same underlying securities may be offset if all of the criteria specified below are satisfied concurrently:
 1. the issuers of the securities, nominal interest rates and their maturity period are the same, and
 2. the securities are denominated in the same currency;
- positions in convertible securities may not be offset by an opposite position in securities to which the underlying securities can be converted;
- the net position of the Fund shall be determined for each currency. Net open currency position shall mean the total of the following constituents:
 - a) positions from non-derivative transactions;
 - b) net futures position (difference between the receivables and liabilities in connection with forward currency transactions, including the capitalised sums of forward currency transactions and currency swaps conducted on the exchange);
 - c) contingent and fully collateralised future income and liabilities;
 - d) net delta risk of options for the same currencies (net delta risk shall mean the difference between the absolute values of positive and negative delta risks. The delta risk of an option transaction is the market value of the underlying currency multiplied by the option's delta);
 - e) the market value of other options denominated in foreign currencies;
- an index-driven derivative instrument may be offset against securities listed under the same reference index, if comprising at least eighty percent of the securities listed under the reference index in question;
- securities pledged as collateral for a loan or transferred under a lending agreement cannot be offset against derivative short positions.

24.6 Management of positions in indices and other complex instruments

An index-driven derivative instrument may be offset against securities listed under the same reference index, if comprising at least eighty percent of the securities listed under the reference index in question.

24.7 Sources of pricing information used for valuation

Prices published by the Government Debt Management Agency (ÁKK), BLOOMBERG or the data reporting agent providing quotes for the instrument concerned shall be used for the purposes of valuation.

24.8 Where the features of the derivatives in which the investment fund plans to invest differ from the general features prescribed by the relevant legislation relating to derivative transactions, a prominent statement drawing attention to that effect, indicating the features of the given derivative transaction and the underlying risk

Not applicable.

24.9 Other information related to the given subject

Not applicable.

25. SPECIAL PROVISIONS RELATING TO REAL ESTATE FUNDS

Not applicable.

IV. Risks

26. DESCRIPTION OF RISK FACTORS

Risk arising from changes in the value of the investment instruments included in the Fund's portfolio: The market price of the investment instruments in the portfolio of the Fund may fluctuate due to changes occurring in the economic and political environment, the monetary policy of central banks, the business activity of the issuers and the credit institutions accepting bank deposits, their liquidity and the perception thereof, and the supply-demand relationship. The Fund Manager can mitigate, but cannot completely eliminate, the effect of price volatility by portfolio diversification, thus the net asset value per unit of the Fund may decline in certain periods. Governments of individual countries may introduce measures (e.g. increase taxes, restrict profit repatriation, etc.) that could potentially have an adverse effect on the Fund.

Credit risk: In the case of certain investment instruments included in the portfolio of the Fund, especially bank deposits, collective investment instruments, debt securities, other money market instruments and derivative instruments traded over the counter, the issuer's potential default may depreciate the value of these assets in the Fund's portfolio, which might in turn cause the Fund's net asset value per Fund Unit to decline.

Foreign exchange risk: The Fund's investments may also be denominated in currencies other than the currency of issue. The Fund Manager does not intend to eliminate (hedge) its currency position for the Currency of Issue continuously; therefore, exchange rate changes may impact the price of the Fund Units. The return on the Fund Units may also be affected by a change in the exchange rate of the Currency of Issue of each series expressed in Hungarian forint or in the official currency of the specific Foreign Distribution Territory.

Risk of default associated with derivative contracts: adverse changes in the liquidity or financial management of the business partners party to the derivative contracts in the portfolio of the Fund can also have a negative influence on the payment of the profit generated on such derivative contracts to the Fund.

Liquidity risk: The liquidity of certain securities and investment instruments may be less than desirable, which means that buyers/sellers for such instruments may be hard to find. As a result, certain securities in the portfolio that the Fund Manager wishes to sell may be hard to dispose of; thus the selling price may be lower than the fair market value of the security at the time.

Potentially adverse change(s) in tax regulations applicable to investment funds and investors: Hungarian and foreign tax regulations applicable to the Fund may change adversely in future (tax increase, introduction of new tax(es), reduction or withdrawal of tax benefits), which means that the Fund or investors may have to pay a higher amount of tax in future. It could also happen that the Fund is forced to pay certain taxes on its incomes from investments that were not envisaged by the Fund Manager upon the acquisition of the investment and were thus not considered in its decision on acquiring the investment.

Suspension of the continuous distribution of the Fund Units: The continuous distribution of the Fund Units may be suspended by the Fund Manager or by the Supervisory Authority pursuant to the relevant provisions of the Collective Investments Act (Sections 114–116); thus investors may not be able to purchase or redeem their Fund Units on the desired day. The period of suspension is 30 days at most, with the proviso that should the Fund invest at least 20 percent of its assets in another investment fund, the period of suspension will be adjusted to the suspension rules of the underlying investment fund. In justified cases, at the Fund Manager's request, the Supervisory Authority may extend the suspension for a period of up to 1 year. The distribution of the Fund Units must be continued when the reasons for the suspension no longer exist or when so instructed by the Supervisory Authority in a resolution.

Decreasing the Fund's capital: In the event of an en masse redemption of the Fund Units, the equity of the Fund may decline to a level where the Fund Manager will initiate the termination of the Fund.

Sustainability risks: environmental, social or governance events or circumstances, whose occurrence or existence could have an actual or potential material adverse effect on the value of the investment. Sustainability risks from environmental impacts include, for example, inadequate management of climate change-related processes, social impacts include failure to enforce internationally recognised labour standards or inadequate efforts to address gender pay gaps, while risks from corporate governance include, for example, non-compliance with workers' rights and data protection requirements.

Sustainability risks may be significant in themselves but, if they materialise, they may also have a material impact on other risk factors and may, for example, adversely affect the level of market risk, liquidity risk, credit risk or operational risk, or adversely affect the value of the Fund's investments, including the overall loss in value, thereby adversely affecting the Fund's performance. Sustainability risks are therefore considered to be normal risks.

Sustainability risks from environmental, social and corporate governance impacts may also materialise in a company-specific manner, where the market value of financial instruments issued by companies that do not comply with sustainability requirements may decrease due to the sustainability risks, which may be caused by events affecting the company's reputation, sanctions imposed on the company or even physical risks triggered by the climate change.

Sustainability risks may also appear in operational risk – causing losses to the Fund as a whole – if the Fund Manager or the service providers engaged by it do not pay sufficient attention to environmental, social and governance considerations.

In making its investment decisions relevant to the Fund, the Fund Manager considers and duly assesses sustainability risks arising from environmental, social and governance aspects among all risks associated with the investment. The purpose of incorporating sustainability risks into investment decisions is to ensure that the risks are recognised as soon as possible so that their impact on the Fund's assets can be properly managed and mitigated.

In the risk management procedures applied by the Fund Manager, the Fund Manager takes account of and measures all risks relevant to the Fund as listed in this section; thus, in particular, the sustainability risks arising from environmental, social and governance aspects, applying risk indicators to assess the risks. Risk indicators assess the risks from each aspect of the sustainability risk in consideration of quantitative and qualitative indicators. The Fund Manager uses ESG ratings and scores provided by an external data provider for the Fund. The data provider uses an extensive industry and company-specific database to summarise and classify each environmental, social and governance segment in a defined way, and then converts these into a single ESG indicator. The Fund Manager uses the indicators provided by the data provider in the investment decision making process.

The Fund Manager integrates sustainability risks and their management in the Fund's decision making processes; accordingly, the Fund is in line with Article 6 of the SFDR Regulation.

The Fund does not aim to promote environmental and/or social characteristics (does not fall within the scope of Article 8(1) of the SFDR Regulation) or make sustainable investments (does not fall within the scope of Article 9(1), (2) and (3) of the SFDR Regulation).

26.1 A description of the Fund's liquidity risk management, including redemption rights and existing redemption arrangements with investors

The Fund Manager monitors and assesses the liquidity risk of the Fund continuously, and ensures that the liquidity profile of the Fund's investments complies with the Fund's obligations. The Fund Manager ensures that the investment strategy, the liquidity profile and the redemption policy are coordinated in respect of the Fund. The Fund's annual and semi-annual reports contain the information on the management of liquidity risk referred to in Section X of Annex 6 to the Collective Investments Act.

V. Valuation of assets

27. *METHOD OF CALCULATION OF THE NET ASSET VALUE, PLACE AND DATE OF PUBLICATION, PROCEDURE IN THE CASE OF ANY ERROR IN THE CALCULATION OF THE NET ASSET VALUE*

The net asset value of the Fund shall be determined by the Depository. The net asset value of the Fund shall be determined using the latest possible market price information relating to the Fund's assets, in accordance with the provisions of the Fund Management Policy. The net asset value of the Fund and the net asset value per Fund Unit for each series shall be established for each Trading Day, and within two Trading Days the data shall be published at the Fund's official means of notification and shall also be made available to investors at the Points of Sale. The Fund Manager shall submit to the Depository all documents which are necessary to establish the net asset value of the Fund without delay, consistent with the frequency of determining the net asset value. The method and information used for the valuation shall be documented in the case of investment instruments under litigation at the time, and for which rights granted to third parties have been registered.

In the event of any error in the calculation of the net asset value of the Fund, the incorrect net asset value shall be corrected at the time of the next assessment of net asset value with retroactive effect to the time when the error was made, if the error exceeds one thousandth of the net asset value of the Fund. In the correction process, the incorrect net asset value shall be adjusted to the correct value for each day for which the net asset value was calculated and which was therefore affected by the error detected. The adjusted net asset value shall be published. Net asset value data and any communications on incorrect net asset values shall be available on the Fund Manager's website (<https://www.otpbank.hu/otpalapkezelo/hu/fooldal>) and on the Principal Distributor's website (<https://www.otpbank.hu>).

If any Fund Units were distributed at the incorrect net asset value, the difference between the prices calculated at the incorrect and at the correct net asset value must be settled with the relevant investor within 30 days from the day on which the error was discovered, except where:

- a) the price differential of one fund unit calculated based on the calculation of incorrect net asset value is less than one thousandth of the price per fund unit calculated based on the correct net asset value or, if the management policy specifies a lower value, the value set out in the management policy,
- b) the amount to be settled as a result of the difference in the prices calculated based on the incorrect and the correct net asset value is less than one thousand forints for each investor or, if the management policy specifies a lower value, the value set out in the management policy, or
- c) the Fund Manager refrains from – if an error was detected in the calculation of net asset value – claiming refund from the investor in connection with the difference in the marketing price of the fund unit resulting from the correction of the error, provided that the Fund Manager or the Depository shall cover the difference for the Fund.

The net asset value determining the daily T-day price is established and expressed in the Currency of Issue by the Depository after 2:00 p.m. on the day of calculation as per the table below based on the market price and yield data (available up to 4:00 p.m. on the same day) and the valuation rules defined in Sections 28 and 29, and is published at the official means of notification on the second Trading Day in Hungary following the day of the calculation at the latest. The net asset value shall be calculated for every Trading Day. If the investment instrument in question is listed on more than one stock exchange, the Depository shall be entitled to decide which stock exchange price should be used. Prices published by the Government Debt Management Agency (ÁKK), BLOOMBERG or the data reporting agent providing quotes for the instrument concerned shall be used for the purposes of the valuation referred to in Section 28.

The net asset value of the Fund equals the value of the opening assets in the Fund's portfolio on T-1 day, calculated in accordance with Sections 28 and 29 and reduced by the liabilities of the Fund referred to in Section 28. The net asset value per Fund Unit equals the net asset value of the Fund divided by the opening number of Fund Units in circulation on T-1 day.

The Depository determines the share of each Fund Unit Series in the total net asset value by dividing the sum of the net asset value of the given series on T-1 and the total price of distribution on T-2 by the Fund's total net asset value plus the distribution price on T-2, which ratio is also taken into consideration by the Depository for the distribution of the Fund's assets and the expenses incurred by the Fund.

If, for any reason, the net asset value cannot be determined, then the value last determined shall be published and communicated together with a detailed description of the circumstances and facts preventing the calculation of the net asset value.

Fund	Day of the market prices for determining the net asset value on T-day	Day of the calculation of the net asset value as at T-day	Day of concluding the contract for the Fund Unit which is settled at the price on T-day
OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)	T-1 day	T-1 day	T-day

28. VALUATION OF ASSETS IN THE PORTFOLIO, A DESCRIPTION OF THE VALUATION PROCEDURE AND OF THE PRICING METHODOLOGY FOR VALUING ASSETS, INCLUDING THE METHODS USED TO VALUE HARD-TO-VALUE ASSETS IN ACCORDANCE WITH SECTION 38

- a) In calculating the net asset value of the Fund, we consider the opening T-1 day balance of the *current account* increased by the interests accumulated by the T-day. If there is a difference between the calculated pro rata interest and the interest credited at the end of the interest period, the interest differential shall be recognised in the net asset value on the day of the credit transaction.
- b) For the calculation of the net asset value, the value of time deposits shall also be increased by the pro rata interests on T-day. If there is a difference between the calculated pro rata interest and the interest credited at the end of the interest period, the interest differential shall be recognised in the net asset value on the day of the credit transaction.
- c) *Fixed-interest Hungarian government bonds issued in Hungary in forints with a remaining maturity of more than three months and discount treasury bills* are valued at the gross price calculated for T-day, based on the mean value of their best bid-ask spreads last published by the Government Debt Management Agency (ÁKK) in the context of primary dealer quotation on T-1 day or, in the absence thereof, on the last day available on the date of net asset valuation. Securities purchased through IPO shall be valued on a gross basis using the net purchase price from the date of listing to the date of issue, provided that there are no quotes yet.
- d) *Variable-interest Hungarian government bonds issued in Hungary in forints with a remaining maturity of more than three months* are valued by adding up the mean value of their best bid and ask net price published in the context of primary dealer quotation on T-1 day or, in the absence thereof, on the last day available on the date of net asset valuation and the pro rata interest accrued up until T-day. Securities purchased through IPO shall be valued on a gross basis using the net purchase price from the date of listing to the date of issue, provided that there are no quotes yet.
- e) *Hungarian government securities, denominated in HUF, with a remaining maturity of three months or less* are valued at the gross price calculated for T-day based on the 3-month benchmark yield of the Government Debt Management Agency (ÁKK) on T-1 day or, in the absence thereof, on the last day available on the date of net asset valuation.
- f) *Debt securities with original maturities of less than 3 months issued by the MNB (MNB bonds)* are valued at the discounted value for T-day using issue yields for discount securities and at the gross price for T-day for interest-bearing securities (gross price is net price at the time of purchase plus pro rata interest accrued up until T-day).
- g) The market value of *debt securities other than those listed above (including Hungarian government securities issued in foreign currency, international government securities, publicly traded bond-type instruments of credit institutions, economic operators and Hungarian local governments, money market instruments and mortgage bonds)* is determined at T-day gross value calculated from the mean value of the net bid and ask price quoted at closing on the last day available on the date of net asset valuation (displayed by Bloomberg or published by the data reporting service provider providing quotes for the given instrument). Securities purchased through IPO shall be valued on a gross basis using the net purchase price from the date of listing to the date of issue, provided that there are no quotes yet.
- h) *Fixed-interest, private bonds, money market instruments and mortgage bonds* are be valued at gross T-day price based on the mean value of the best closing bid and ask prices quoted by 3 market makers on the last day available on the date of net asset valuation. If there are no price quotes available, the securities are be

valued at the gross price calculated for T-day using the yield in effect on the day of the purchase. Securities purchased through IPO shall be valued on a gross basis using the net purchase price from the date of listing to the date of issue, provided that there are no quotes yet.

- i) *Shares listed on the Budapest Stock Exchange* are valued at closing price on the last day available on the date of net asset valuation. If a given share has not been traded since its initial offering on the stock exchange, it shall be valued at purchase price.
- j) *Foreign shares and ETFs* are valued at closing price on the last day available on the date of net asset valuation. If a given share or ETF has not been traded since its initial offering on the stock exchange, the share or the ETF shall be valued at purchase price.
- k) If, in the Depository's opinion, the liquidation price of securities is lower than the price calculated according to points c)-j), then the liquidation price determined by the Depository shall be used as a basis for the calculation of the net asset value. In the case of Hungarian government securities, the liquidation price shall be determined from the highest purchase price published by the members of the primary dealer system of the Government Debt Management Agency when the bonds are listed on the secondary market, while in the case of other securities it shall be calculated from the price displayed on the screens of BLOOMBERG or, in the absence thereof, from the price quotes requested ad hoc from distributor(s) or, in the case of securities listed on the stock exchange, from the exchange price.
- l) Debt securities issued abroad shall be valued in accordance with the valuation principles shown in points c)-j), based on the prices displayed by BLOOMBERG.
- m) Fund units of open-end funds are valued at the latest net asset value per unit available during net asset valuation.

The fund units of closed-end investment funds shall be valued as follows:

- (a) if there are quotes for the units of the specific closed-end investment fund, they are valued at the mean value of the T-2 day bid-ask quote;
- (b) if there are no quotes for the units of the specific closed-end investment fund, they are valued at the T-2 day net asset value per unit.

If the T-2 day net asset value per unit is not available, the last available NAV per unit shall be applied.

- n) When valuing *hold-in custody repurchase agreements*, the spot and the forward legs shall be taken into consideration simultaneously as follows:

spot purchase – forward sale: the security purchased should not be included in stocks; instead, the bid price of the security purchased plus the T-day pro rata spread between the ask price and the bid price shall be added to receivables.

spot sale – forward purchase: the security sold should still be included at market value in the net asset value, and the ask price plus the T-day pro rata spread between the ask price and the bid price shall be added to the liabilities of the Fund.

- o) When valuing *delivery repo agreements*, the spot and the forward legs shall be taken into consideration simultaneously as follows:

spot purchase – forward sale: the security purchased shall be included in the net asset value at market price, and the bid price plus the T-day pro rata spread between the ask price and the bid price minus the T-day market price of the security purchased shall be added to the receivables of the Fund.

spot sale – forward purchase: the security sold shall be removed from the net asset value, and the ask price plus the T-day pro rata spread between the bid price and the ask price minus the T-day market value of the security sold shall be added to liabilities.

- p) Receivables shall be recognised in accordance with the accounting regulations applicable to investment funds. If the Depository deems any of the receivables of the Fund doubtful, then this fact shall be noted and the net asset value shall be reduced by the amount of the anticipated losses.

- q) Securities lent shall be removed from stocks and their market value shall be added to receivables.
- r) Securities borrowed shall be moved to stocks and the market value of the securities borrowed shall be added to liabilities.
- s) The value of assets whose price is expressed in currencies other than the Currency of Issue shall be converted into the Currency of Issue using the T-1 day official mid-rates of the Magyar Nemzeti Bank. Foreign currencies not quoted by the Magyar Nemzeti Bank shall be valued at the cross-rate calculated from the closing USD/HUF exchange rate and the USD/FX exchange rate provided by Bloomberg for the given foreign currency on the last day available on the date of net asset valuation.
- t) Liabilities shall be recognised in accordance with the accounting regulations applicable to investment funds. The value of services used but not yet invoiced (including the pro rata fund management and supervisory fees) shall be recognised as liabilities.

The value of liabilities whose price is expressed in currencies other than the Currency of Issue shall be converted into the Currency of Issue using the T-1 day official mid-rates of the Magyar Nemzeti Bank. Foreign currencies not quoted by the Magyar Nemzeti Bank shall be valued at the cross-rate calculated from the closing USD/HUF exchange rate and the USD/FX exchange rate provided by Bloomberg for the given foreign currency on the last day available on the date of net asset valuation.

Illiquid assets shall be valued by way of expert estimates. The expert price shall be determined by the Depositary based on the last known market prices observed in the main market of the given financial instrument, adjusting the prices using the method chosen by the Depositary (market comparison with highly correlating instruments, valuation based on discounted cash flow, application of an adjustment coefficient defined by way of a scenario analysis).

For both assets that have become illiquid and hard-to-value assets, the Depositary shall proceed in consideration of the following criteria:

- The instruments are valued at the frequency defined in the Valuation Policy, and the valuation takes into account the information available on the given instrument, and also assesses the risk of failure to sell and the risks of non-payment.
- If such a risk arises, the estimated probability of its occurrence shall be built in the valuation on a pro rata basis, whereby the book value shall be decreased continuously.
- If it is impossible to sell the given instrument and its sale is unlikely even in the future, or if the issuer becomes insolvent, the valuation may consider the option of fully writing off the instrument.
- If new, relevant information becomes publicly available on the instrument or the Depositary obtains such information, the valuation shall be repeated.
- The valuation shall be reviewed regularly with the approval of the Valuation Committee, and the period between two valuations may not exceed 30 days.

The valuation shall pay particular attention to 'hard-to-value' assets, the valuation of which shall be considered to be subject to a separate review as there is a significant risk that the valuation may not be appropriate.

The review shall be performed subject to the approval of the valuation committee operated by the Fund Manager, the permanent members of which are employees fulfilling the functions defined in the prevailing Valuation Policy:

- (i) head of risk management
- (ii) Head of the Back Office
- (iii) Head of the Middle Office
- (iv) Compliance Officer

The valuation policies and procedures describe the review process, including sufficient and appropriate tests and checks for the reasonability of individual values. Reasonability must be assessed in terms of the existence of an appropriate level of objectivity. These checks and controls may generally include the following, depending on the nature of the instrument and the available control methods and price sources (without limiting the possibility to add additional methods to the following checks and controls):

- a) verifying values by comparing prices obtained from business partners with each other and between different periods;
- b) validating the values by comparing the realised prices with the latest book values;
- c) taking into account the reputation, consistency and quality of the valuation source;
- d) comparison with third-party values;
- e) examining and documenting exceptions;

- f) highlighting and studying deviations that appear unusual or that vary according to the valuation benchmark defined for the asset type;
- g) searching for obsolete prices and related parameters;
- h) comparing with the price of the related assets or hedging transactions related thereto;
- i) reviewing the inputs used in the model-based pricing, in particular those for which the model price shows significant sensitivity.

29. VALUATION OF DERIVATIVE TRANSACTIONS

- a) The value of *options* purchased shall increase the net asset value, while options sold shall reduce it. The value of the option shall be the T-2 day mid-price calculated from the bid price and ask price quoted for the option, and if that is not available, the last available mid-price. Where the valuation of an option is based solely on the prices provided by the writer, the Fund Manager shall regularly review the appropriateness of the valuation of the option or the prices on which the valuation is based, using one of the methods of examination and verification referred to in Section 28.
- b) The value of *swaps* equals the sum of the values of the elementary transactions comprising the swaps. If the elementary transactions cannot be valued as per the above, the swap shall be valued at the value quoted by the data reporting agent providing quotes for the specific transaction or by way of an external appraiser.
- c) *Futures* are valued using the stock exchange closing price on the last day available on the date of net asset valuation.
- d) *OTC foreign exchange forward transactions* are valued using the T-1 day spot rate (MNB mid-rate) and closing interbank interest rates quoted in the currencies concerned on the last day available on the date of net asset valuation or at forward rates calculated from the swap points quoted on the interbank market.
- e) The T-day market value of the *forward purchase agreement* equals the difference between the closing market value of the underlying instrument on the last day available on the date of net asset valuation – reduced by the present value of the cash flows expected until the delivery of the forward transaction – and the T-day present value of the bid price defined in the forward agreement.
- f) The T-day market value of the *forward sale agreement* equals the difference between the T-day present value of the ask price defined in the forward agreement and the closing market value of the underlying instrument on the last day available on the date of the net asset valuation reduced by the present value of the cash flows expected until the delivery of the forward transaction.

30. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Segregation of the Fund's assets which have become illiquid

If more than 5 percent of the Fund's assets have become illiquid, in order to ensure the principle of equal treatment among investors and to maintain continuous distribution, the Fund Manager may decide to segregate the illiquid assets within the Fund's portfolio or segregate the Fund Units embodying illiquid assets within the Fund Unit portfolio.

Once the decision on segregation is made, the assets deemed illiquid are to be shown separately from the Fund's other assets for the purposes of calculating the net asset value. Moreover, the Fund Units of the Fund shall be allocated among the investors in the proportion the illiquid assets represent in the net asset value of the Fund. Following segregation, the Fund Units embodying illiquid assets shall be marked "IL".

Fund Units marked "IL" may not be redeemed.

When the reasons for segregation no longer apply, the Fund Manager shall decide on terminating the segregation in part or in whole, and shall replace the Fund Units marked "IL" with the Fund Units of the Fund based on the Exchange Ratio corresponding to the prevailing prices of the Fund Units.

The Fund Manager shall – in accordance with the provisions on extraordinary disclosure of information – notify the investors and the Supervisory Authority on the segregation of the assets, on the termination of segregation in part or in whole, and the reasons therefor. The annual and semi-annual reports of the Fund shall contain detailed information as to the composition of segregated assets.

The Fund Manager shall suspend the distribution of the Fund Units concurrently with the publication of the decision on segregation until the segregation is in fact implemented.

VI. Information relating to returns

31. CONDITIONS AND RULES CONCERNING THE ASSESSMENT AND PAYMENT OF DIVIDENDS

The Fund shall not pay any yields from the capital gain, rather, it shall reinvest it in its entirety, in accordance with the investment policy of the Fund. Any capital gain shall be realised by investors as a difference between the purchase and redemption prices of their Fund Units.

32. DISTRIBUTION DATES

Not applicable.

33. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Not applicable.

VII. Pledge to protect the capital invested and to guarantee earnings, means of the implementation thereof

34. PLEDGE TO PROTECT THE CAPITAL INVESTED AND TO GUARANTEE EARNINGS

34.1 Bank guarantee securing the pledge to protect the capital invested and to guarantee earnings

Not applicable.

34.2 Investment policy supporting the pledge to protect the capital invested and to guarantee earnings

Not applicable.

35. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Not applicable.

VIII. Fees and expenses

36. FEES AND EXPENSES CHARGEABLE TO THE FUND, AND THE WAY OF CHARGING THEM TO THE FUND

36.1 Fees and expenses the Fund is liable to pay to the Fund Manager, description of the method of calculation and the method of charging them to the Fund, terms of payment

For performing its activity and for the other services not qualifying as mediated and non-mediated services listed below, the Fund Manager charges a fee, which may not exceed 1% of the Fund's net asset value per annum. For Series "I" Fund Units, the Fund Manager shall not charge any fund management fees.

Method of charging the fund management fee: The pro rata portion of the fund management fee – calculated for the last net asset value – is debited daily, and becomes payable from the first day after the reference month.

The fund management fee was defined in consideration of the fact that the fee for the mediated services [point (a)] and non-mediated services [point (b)] listed below, the costs related to the foundation, merger or demerger of the Fund and the amendment of the Fund Management Policy, and the administrative service fees payable to the Supervisory Authority are already included in the fee; therefore, they may not be charged to the Fund directly:

- a) mediated services:
 - aa) advertising and promotion of the Fund and the Fund Units issued by the Fund, and the related commercial communication;
 - ab) public offering of the Fund Units and distributor services engaged for their continuous distribution;
- b) other, non-mediated services:
 - ba) discharge of the administrative tasks listed in Section 7(2)(a) of the Collective Investments Act,
 - (i) including cases where any one of these tasks is carried out by another person under an agency contract which does not constitute outsourcing; thus, in particular:
 - accounting tasks

If the Fund's capital did not reach 50 percent of the mandatory minimum of initial capital on average over a period of three months, the Fund Manager may not charge the management fee to the Fund as long as the Fund's equity does not reach 50 percent of the mandatory minimum of initial capital on average for the last three months. The costs incurred during the free period shall not be charged to the Fund subsequently.

36.2 Fees and expenses the Fund is liable to pay to the Depositary, description of the method of calculation and the method of charging them to the Fund, terms of payment

The annual depositary fee charged to the Fund by the Depositary shall not exceed 0.06% of the Fund's net asset value. The pro rata portion of the depositary fee – calculated for the last net asset value – is accrued daily, and becomes payable on the last banking day of the month following the reference month.

36.3 Fees and expenses the Fund is liable to pay to other parties or third persons, description of the method of calculation and the method of charging them to the Fund, terms of payment

Fees payable by the Fund to the Auditor

The Auditor charges an auditor's fee of maximum EUR 10,000 to the Fund per annum. The pro rata portion of the Auditor's fee is accrued daily, and it is paid annually.

Fees payable by the Fund to the Supervisory Authority

Pursuant to the relevant legislation, the Fund shall pay a variable supervisory fee to the Supervisory Authority. At the time of drawing up the Information Notice (Prospectus), the annual variable supervisory fee was 0.35% of the Fund's average net asset value, which is transferred by the Fund to the account of the Supervisory Authority by the last day of the month following the reference quarter.

Special tax imposed on investment funds

Under the effective legal regulations, the Fund is subject to a special tax. The annual tax rate is 0.05 percent of the Fund's net asset value reduced by the HUF value of the securities held by the Fund, as calculated and defined in the relevant regulation. The tax liability shall be determined by the Fund Manager on a quarterly basis by the 20th day of the month following the reference quarter, and declared and paid using the form provided by the state tax authority.

37. POSSIBLE EXPENSES OR FEES CHARGED TO THE FUND AND THE INVESTORS

Costs associated with investing the assets of the Fund

All costs, fees and commissions incurred in connection with the transactions of the Fund and paid to investment service providers, brokers or the depository, as well as the costs charged by clearing houses, LEI code issuers and trade repositories and bank costs shall be borne by the Fund. The Fund shall also bear the credit fees and other bank charges on loans taken out on behalf of the Fund.

Rate of the above costs: maximum 0.5% of the Fund's net asset value per annum.

Other costs and expenditures payable by the Fund

With the exception of the items listed in Section 36.1 charged to the Fund as fund management fee (as fee for mediated services), the Fund shall bear all costs and expenditures incurred in connection with the management and investments thereof, including taxes and legal expenses, as well as payment obligations imposed on the Fund pursuant to effective final court rulings / official resolutions, including the costs of proceedings and any other costs and expenditures incurred in connection with the proceedings, and the costs of any enforcement of claims against or by the Fund.

Rate of the above costs: maximum 0.5% of the Fund's net asset value per annum.

Fees and commissions charged to investors for purchasing, holding and redeeming the Fund Units

At the Points of Sale of the Principal Distributor, sales, redemption, reinvestment and reallocation commissions are charged during the continuous distribution of the Fund Units.

During the continuous distribution of the Fund Units, sales and redemption commissions are charged in relation to the transactions executed at the Points of Sale of Co-distributors.

The maximum rate of the commissions related to the sale and redemption of the Fund Units is specified in Section 44.2 of the Fund Management Policy.

The Distributor shall credit the purchased Fund Units to the Investor's securities account kept with the Distributor. The Points of Sale shall charge the fees for securities account management and any other services used by the investor as specified in the Distributor's prevailing Announcement (e.g. securities transfer fee, credit transfer fee, cash withdrawal fee).

38. HIGHEST RATE OF FUND MANAGEMENT FEES CHARGED TO OTHER COLLECTIVE INVESTMENT TRUSTS IN WHICH THE FUND MAY INVEST AT LEAST 20 PERCENT OF ITS ASSETS

Not applicable.

39. CONDITIONS AND COSTS OF SWITCHING BETWEEN INVESTMENT COMPARTMENTS

Not applicable.

40. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Not applicable.

IX. Continuous distribution of the Fund Units

41. PURCHASE OF FUND UNITS

Fund Units can be bought in person, through a proxy or in a manner specified in a separate contract concluded with the Distributor at the Points of Sale, with the payment to be made in the Currency of Issue.

41.1 *Acceptance, execution and settlement of buy orders, timing of their acceptance within the day (including buy orders taken at the Principal Distributor and Co-distributors)*

When purchasing Fund Units, the payment shall be secured by the funds available on the investor's bank account kept in the Currency of Issue.

The number of Fund Units to be credited to the investor's account equals the integer part of the quotient of the margin amount – less sales commission – and the per unit net asset value calculated for the Trading Settlement Day.

The service contract containing the order specifies the amount of money intended for the purchase of Fund Units. At the time of purchase of the Fund Unit, the Trading Settlement Day is the day of contract conclusion. On the Trading Settlement Day (which is also the Trading Payment Day), the Distributor credits to the investor's account as many Fund Units as the integer part of the quotient of the purchase price and the per unit net asset value calculated for the Trading Settlement Day, provided that the sum of the purchase price and the sales commission is available on the investor's bank account kept in the Currency of Issue.

Buy orders are taken during the opening hours of the Points of Sale, during Trading Hours.

The opening hours of individual Points of Sale may vary; investors are requested to inquire at the specific Point of Sale.

Upon the purchase of Fund Units, the Point of Sale shall charge the investor with the commissions and fees specified in the Distributor's prevailing Announcement.

41.2 *Trading Settlement Day for buy orders*

At the time of purchase of the Fund Unit, the Trading Settlement Day is the day of contract conclusion. Similarly, in the case of **cross-border marketing**, the Trading Settlement Day defined above shall prevail.

41.3 *Trading Payment Day for buy orders*

In the case of the purchase of a Fund Unit the Trading Payment Day is the same as the Trading Settlement Day. Similarly, in the case of **cross-border marketing**, the Trading Payment Day defined above shall prevail. If the Trading Day falls on a bank holiday abroad, the Trading Payment Day for cross-border transactions may be extended by the number of interim foreign bank holidays.

42. REDEMPTION OF FUND UNITS

42.1 *Acceptance, execution and settlement of redemption orders, timing of their acceptance within the day (including redemption orders taken at the Principal Distributor and Co-distributors)*

Fund Units can be redeemed in person, through a proxy or in a manner specified in a separate contract concluded with the Distributor at the Points of Sale, by debiting the securities account.

At the time of the **redemption** of a Fund Unit the Trading Settlement Day is the day of contract conclusion. The Point of Sale settles the delivery with the investor on the Trading Settlement Day (which is also the Trading Payment Day). Redemption orders are taken during the opening hours of the Points of Sale, during Trading Hours. The opening hours of individual Points of Sale may vary; investors are requested to inquire at the specific Point of Sale.

Upon the redemption of Fund Units, the Point of Sale shall charge the investor with the commissions and fees specified in the Distributor's prevailing Announcement.

Similarly, in the case of **cross-border marketing**, the Trading Payment Day defined above shall prevail. If the Trading Day falls on a bank holiday abroad, the Trading Payment Day for cross-border transactions may be extended by the number of interim foreign bank holidays.

Upon redemption the amount payable for the Fund Units net of the redemption commission and – in case interest tax is also payable on the transaction – the applicable interest tax shall be credited to the Customer’s bank account held with the Distributor in the Currency of Issue upon the execution of the sale and purchase contract.

42.2 Trading Settlement Day for redemption orders

At the time of the redemption of a Fund Unit the Trading Settlement Day is the day of contract conclusion. Similarly, in the case of **cross-border marketing**, the Trading Settlement Day defined above shall prevail.

42.3 Trading Payment Day for redemption orders

In the case of the redemption of a Fund Unit the Trading Payment Day is the same as the Trading Settlement Day. Similarly, in the case of **cross-border marketing**, the Trading Payment Day defined above shall prevail. If the Trading Day falls on a bank holiday abroad, the Trading Payment Day for cross-border transactions may be extended by the number of interim foreign bank holidays.

43. DETAILED PROVISIONS FOR THE CONTINUOUS DISTRIBUTION OF FUND UNITS

The Fund Manager shall appoint the Principal Distributor to sell the Fund Units during the continuous distribution thereof. If any additional distributors are included in the distribution, they shall participate in the distribution as Co-distributors under a contract concluded with the Principal Distributor and with the Fund Manager, forming a distribution syndicate with the Principal Distributor. Any provision in the Prospectus and in the Fund Management Policy that refers to the “Distributor” should be understood as both the Principal Distributor and the Co-distributors, as the case may be.

The Distributor is entitled to engage an intermediary for the sale and for the redemption of Fund Units. The intermediary shall be subject to the provisions set out in Sections 111–116, 123(1)(e), 123(4)(a) and 159(2)–(5) of the Investment Firms Act. The Distributor shall be liable to the investors for the activity of the intermediary engaged by it as for its own.

The distribution price of Fund Units shall be based on the net asset value per Fund Unit per series.

Except for the suspension or temporary discontinuation of distribution or, with regard to the Distributor concerned, the suspension of the Distributor’s customer service, the Distributor is required to accept buy and redemption orders for the Fund Units of a given series issued by the Fund on Trading Days, during the Trading Hours of the Points of Sale specified for distribution of that series of Fund Units, in the case of Series “I” Fund Units subject to the limit set by the Fund Manager regarding the scope of investors that may acquire Series “I” Fund Units during primary distribution (limited to Professional Investors contacted by the Fund Manager).

Buy and redemption orders submitted by investors as per the above and received during the Trading Hours of the relevant Point of Sale shall be settled for the same Trading Day, as Trading Settlement Day, and consideration for the orders settled shall be credited or paid to the investors on the same day, as Trading Payment Day.

During the continuous distribution, a sales commission or a redemption commission may be charged to investors, which is due, in part or in full, to the Fund, to the Distributor or to the Fund Manager (for more detail, see Section 44.2 below). The investor shall be notified in advance of the rates of such commissions. The principle of equal treatment shall not be breached if the fees or commissions charged to investors for continuous distribution services are determined by the distributors, or if the Fund Manager sets different contractual terms and conditions for different distributors.

The Distributor shall be responsible for distributing the amount among the holders of the Fund Units upon the purchase or the redemption of the Fund Units or upon the termination of the Fund. The Distributor performing distribution activities shall be liable to investors for the execution of purchase or redemption orders during the continuous distribution. The Principal Distributor shall remain responsible in respect of issues concerning the sales of the Fund Units and falling within its authority pursuant to the Principal Distributor Contract concluded with the Fund Manager even if the Principal Distributor is not the proceeding Distributor in the transactions in question.

43.1 Circulation limit

Not applicable.

43.2 Procedure to follow upon reaching the circulation limit, specific details upon which marketing may be resumed

Not applicable.

44. DETERMINATION OF THE PURCHASE PRICE AND THE REDEMPTION PRICE OF THE FUND UNITS

Fund Units shall be purchased and redeemed, in the Currency of Issue, at the Fund's net asset value per unit applicable on the Trading Settlement Day.

44.1 Method and frequency of the calculation of those prices

The Depository defines the net asset value determining the daily T-day price in the Currency of Issue, and publishes it at the official means of notification by no later than the second Trading Day in Hungary following the T-day. The net asset value shall be calculated for every Trading Day.

44.2 Information concerning the highest amount of charges relating to the purchase and the redemption of the Fund Units, indicating whether such remuneration is payable to the Fund, the Distributor or the Fund Manager

The fee for purchase orders placed at the Points of Sale related to the Principal Distributor is maximum EUR 10 for Series "A" Fund Units, payable in full to the Principal Distributor.

The fee for redemption and roll-over orders placed at the Points of Sale related to the Principal Distributor is maximum EUR 10 for Series "A" Fund Units, payable in full to the Principal Distributor. No sales commission is charged for Series "I" Fund Units (Professional Investors).

During the continuous distribution of the Fund Units in the case of the transactions executed at the Points of Sale listed in Annexes 2.c to 2.i of the Fund Management Policy, the rate of the sales and redemption commissions does not exceed 5% of the invested or redeemed amount, respectively, and is retained in full by the Co-distributors.

The sales and redemption commissions above are the maximum values to be charged; in some cases the investor may pay less. Detailed information on the commissions charged are included in the Distributor's prevailing Announcement.

Securities account management

The Distributor shall credit the purchased Fund Units to the Investor's securities account kept with the Distributor. During continuous distribution the Distributor only redeems Fund Units on the investor's securities account kept with the Distributor.

For the securities account management service, the Point of Sale shall charge the fees specified in the Distributor's prevailing Announcement.

45. INDICATION OF REGULATED MARKETS WHERE THE FUND UNITS ARE LISTED OR TRADED

The Fund Units shall not be admitted to regulated markets. The Distributor shall be liable to investors for the execution of purchase or redemption orders during the continuous distribution.

46. INDICATION OF THE STATES WHERE THE FUND UNITS ARE MARKETED

At present, the Fund Units are distributed by the Principal Distributor and the Co-distributors in the territory of Hungary. After passporting and obtaining marketing authorisation for the Fund, the Fund Units also become available abroad (in another EEA State or a third country).

47. OTHER INFORMATION RELATED TO THE GIVEN SUBJECT

Not applicable.

X. Additional information relating to the Fund

48. HISTORICAL PERFORMANCE OF THE FUND

The Fund's net asset value on 31.12.2022: EUR 36,794,284

Return calculated for the period of 31.12.2010-30.12.2011:	4.68%
Return calculated for the period of 30.12.2011-28.12.2012:	3.44%
Return calculated for the period of 28.12.2012-31.12.2013:	1.45%
Return calculated for the period of 31.12.2013-31.12.2014:	0.7%
Return calculated for the period of 31.12.2014-31.12.2015:	0.7%
Return calculated for the period of 31.12.2015-31.12.2016:	-0.28%
Return calculated for the period of 31.12.2016-31.12.2017:	-0.62%
Return calculated for the period of 31.12.2017-31.12.2018:	-0.61%
Return calculated for the period of 31.12.2018-31.12.2019:	-0.54%
Return calculated for the period of 31.12.2019-31.12.2020:	-0.7%
Return calculated for the period of 31.12.2020-31.12.2021:	-0.74%
Return calculated for the period of 31.12.2021-31.12.2022:	-1.32%
Return calculated for the period of 31.12.2022-31.12.2023:	4.42%

The Fund's past performance is no guarantee for its future performance or return.

49. CONDITIONS OF WITHDRAWING THE FUND UNITS OF THE FUND

Not applicable.

50. CIRCUMSTANCES IN WHICH TERMINATION OF THE FUND CAN BE DECIDED, IN PARTICULAR AS REGARDS THE RIGHTS OF INVESTORS

The decision for the opening of a procedure for the dissolution of the Fund lies with the Fund Manager or the Supervisory Authority.

Pursuant to Section 75(2) of the Collective Investments Act, the dissolution procedure must be opened if:

- “a) the net asset value of the publicly available open-ended investment fund remains below twenty million forints on average over a period of three months;
- b) the net asset value of the investment fund becomes negative;
- c) the Authority has withdrawn the investment fund manager's authorisation for the pursuit of investment fund management activities;
- d) the Authority has ordered the investment fund manager to transfer the management of the investment fund; however, no other investment fund manager has agreed to take over such management functions;

e) the conditions for distribution remain unsatisfactory following suspension of the distribution of investment units or suspension of the redemption of investment units.”

The dissolution procedure shall be opened automatically in the cases shown in Section 75(3) of the Collective Investments Act, of which the case described in sub-paragraph (b) may be relevant to the Fund:

“b) upon receipt of redemption orders from all investors for the redemption of all investment units;”

Dissolution rules applicable to the Fund as an open-end investment fund under the Collective Investments Act:

The Fund Manager shall immediately notify the Supervisory Authority upon having decided to open the dissolution procedure, as well as the investors and creditors of the Fund by means of special notice.

The dissolution procedure under Section 75(2)(c)–(d) of the Collective Investments Act shall be conducted by the Depositary.

During the dissolution procedure, the Fund shall continue to operate in accordance with the general provisions, with the following derogation:

a) the net asset value of the investment fund shall be established once a month, and shall be published according to the general rules, with an indication that the fund is undergoing dissolution;

b) the continuous distribution of the investment units shall be suspended, and in the case of closed-ended funds new investment units may not be issued;

c) proceeds from the sale of the investment fund’s assets may be invested in liquid assets only, until the notice of dissolution is completed.

During the dissolution procedure the financial instruments included in the investment fund’s assets must be sold within 1 month. Assets shall be offered at the prevailing market price in the case of financial instruments. The time limit for sale may be extended under authorisation by the Supervisory Authority in the interest of investors by 3 months in the case of financial instruments, and by 6 months in the case of other assets.

Upon receipt of the proceeds from the sale of the investment fund’s assets in full and after all liabilities are satisfied, a notice of dissolution shall be prepared within 5 working days. The notice of dissolution shall be submitted to the Authority and shall be made available to the investors at the same time. The notice of dissolution shall at least contain the information specified in Annex 4 to the Collective Investments Act. Following the publication of the notice of dissolution the pay-out of funds may commence.

At the investment fund manager’s request, the Authority shall remove the fund from the register on the day immediately following the date of submission of the notice of dissolution. The investment fund shall be deemed terminated when withdrawn from the register.

If the capital of an investment fund is positive, the proceeds from the sale of the investment fund’s assets, if any capital remains after the fund’s debts and liabilities are deducted, shall be distributed among the investors according to the percentage of the value of their holdings of investment units.

In the course of the dissolution procedure, prepayments may be made to the investors from the proceeds from the sale of assets, or from the investment fund’s bank account, if its balance is positive. The decision for making prepayments shall be disclosed in a special notice. Prepayments shall be proportionately consistent with the net asset value of investment units held. Prepayments shall not be made from funds set aside to cover the investment fund’s liabilities (creditor’s claims from the investment fund).

The depositary shall begin to distribute the funds available to the investors within 5 working days following the date of submission of the notice of dissolution to the Authority, taking into account the prepayments effected in accordance with the above. Commencement of the distribution of funds shall be announced in a special notice. The depositary shall place the funds earmarked for payment to the investors in a discretionary account until payment is remitted.

If the capital of an investment fund is negative, creditors’ claims shall be satisfied according to the order of satisfaction defined in Act XLIX of 1991 on Bankruptcy Proceedings and Liquidation Proceedings (“Bankruptcy Act”), up to the amount available.

Assets in the Fund’s portfolio shall not be construed as the property of the Fund Manager, and may not be used for satisfying the creditors of the Fund Manager.

51. ANY OTHER INFORMATION NECESSARY FOR INVESTORS TO BE ABLE TO MAKE AN INFORMED DECISION ON THE INVESTMENT PROPOSED TO THEM

Pursuant to the provisions of Regulation (EU) 2015/2365 of the European Parliament and of the Council of 25 November 2015 on transparency of securities financing transactions and of reuse and amending Regulation (EU) No 648/2012, the Fund Manager provides the following information in relation to the Fund:

<p>General description of the securities financing transactions and total return swaps used by the Fund and the rationale for their use</p>	<p>The Fund does not execute total return swaps. The general description of the securities financing transactions applied by the Fund (repurchase and reverse repurchase agreements, buy-sell back transactions and sell-buy back transactions, as well as securities lending/borrowing transactions) is included in Section 13 of the Fund Management Policy. The transactions are used in order to promote the implementation of the investment strategy described in Section 12 of the Fund Management Policy.</p>															
<p>Overall data to be reported for each type of securities financing transactions</p>																
<p>Types of assets that can be subject to them</p>	<p>Government securities and securities guaranteed by the state, Bank Deposits, Mortgage Bonds and other secured bonds, Other debt securities, Shares, Collective investment securities</p>															
<p>Maximum proportion of the Fund's assets under management that can be subject to them</p>	<table border="1"> <thead> <tr> <th></th> <th>Maximum proportion</th> </tr> </thead> <tbody> <tr> <td>Government securities and securities guaranteed by the state</td> <td>100%</td> </tr> <tr> <td>Bank deposits</td> <td>40%</td> </tr> <tr> <td>Mortgage bonds and other secured bonds</td> <td>40%</td> </tr> <tr> <td>Other debt securities</td> <td>40%</td> </tr> <tr> <td>Shares</td> <td>20%</td> </tr> <tr> <td>Collective investment securities</td> <td>25%</td> </tr> </tbody> </table>			Maximum proportion	Government securities and securities guaranteed by the state	100%	Bank deposits	40%	Mortgage bonds and other secured bonds	40%	Other debt securities	40%	Shares	20%	Collective investment securities	25%
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Shares	10%															
Collective investment securities	12%															
<p>Criteria used to select counterparties (including legal status, country of origin, minimum credit rating)</p>	<p>Financial institutions of EEA Member States or OECD Member States in the minimum credit rating category</p>															
<p>Acceptable collateral</p>	<p>Cash, and securities of issuers of an EEA or OECD Member State with a credit rating in the minimum investment category, free of litigation, encumbrances and claims and not</p>															

	restricted in transferability, which are the property of the collateral obligor
Collateral valuation	<p>The collateral is valued using daily market values at the following admission value:</p> <ul style="list-style-type: none"> • at 100% for cash • in the case of Hungarian government securities, at the admission price published by the Magyar Nemzeti Bank or at the best buy price published by the Government Debt Management Agency • at the admission value specified in the framework agreements or individual contracts in the case of other securities <p>In all cases, framework agreements specify a minimum level of market value of collateral at which the collateral provider is obliged to top up the collateral.</p> <p>For the transaction types specified in legal regulations or agreed upon by the counterparties, the framework agreements shall have a daily variation margin.</p>
Risks linked to the transactions	<p><i>Credit risk:</i> the potential default of the issuers of debt securities may lead to the collapse or even to the total elimination of the market value of such assets in the Fund's portfolio.</p> <p><i>Liquidity risk:</i> the liquidity of certain securities may be less than desirable, which means that buyers/sellers for such instruments may be hard to find. As a result, certain securities that the Fund Manager wishes to sell may be hard to dispose of.</p>
How assets subject to the transactions and collateral received are safe-kept	Assets and collateral received are safe-kept at the Depository
Restrictions on reuse of collateral	The collaterals may be used only in the cases and under the conditions laid down in the framework agreements.
Policy on sharing of return generated by securities financing transactions	<p>Income from securities financing transactions (return, fees) is payable in its entirety to the Fund; transaction fees (interest payable) shall be borne by the Fund.</p> <p>There are no other fees and expenses borne by the Fund, other than the above.</p>

The Fund Manager provides the following information pursuant to Article 7(1) of REGULATION (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector:

In addition to sustainability risk, another important aspect is principal adverse sustainability impact (*Principal Adverse Impact – PAI*). Adverse sustainability impact is defined as a negative outcome of the underlying investment in a product on sustainability factors, i.e. the investments in the Fund may have a direct or indirect adverse impact on sustainability factors (such as air quality, biodiversity, drinking water, human rights, working conditions, etc.).

The Fund Manager shall consider the adverse impact of its investment decisions on sustainability factors in respect of this Fund.

This is done by applying a so-called exclusion and restriction list, whereby the Fund Manager sets investment limits for tobacco, alcohol, gambling, coal mining, arms manufacturing and authoritarian regimes. In addition to, and partly overlapping with, the exclusion lists, the Fund Manager monitors the following PAIs when making investment decisions:

- PAI 5 – Exposure to companies active in the fossil fuel sector
- PAI 14 – Exposure to controversial weapons (anti-personnel mines, cluster bombs, chemical weapons and biological weapons)
- PAI 16 – Investee countries subject to social violations

In addition to the above, and in accordance with the relevant legal requirements, the Fund Manager shall provide information on the trends in all mandatory indicators and, in addition to the mandatory indicators, on the trends in the following indicators in the periodic report:

- Additional indicators related to climate and the environment: Water, waste and pollutant emissions
- Additional indicators related to social and labour rights, respect for human rights, anti-corruption and anti-bribery: Social and employee affairs

The manner in which sustainability impacts are considered and the indicators used are set out in the Fund Manager's *Sustainability Risk Management Policy*, details of which are available in this statement (*Statement on the adverse impact of investments on sustainability factors and the due diligence and engagement policy applied*): <https://www.otpbank.hu/otpalapkezezo/hu/Fenntarthatosag>

Information on the trends in adverse sustainability impacts is available on the Fund Manager's website together with the Fund's annual report: <https://www.otpbank.hu/otpalapkezezo/hu/Fooldal>

Pursuant to Article 7 of REGULATION (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088, the Fund Manager hereby provides the following information:

At present, the Fund's investments do not consider the criteria defined by the European Union for economic activities sustainable from an environmental point of view.

XI. Particulars of participating organisations

52. PARTICULARS OF THE FUND MANAGER COMPANY

52.1 Company name

The Fund Manager of the Fund is OTP Fund Management Ltd. Its legal form: private limited company.

52.2 Registered office

Registered office of the Fund Manager: H-1026 Budapest, Riadó u. 1–3.

Phone number of the Fund Manager: +36 (1) 412 8300, fax: +36 (1) 412 8399, email: levelek@otpalap.hu

52.3 Company registration number of the Fund Manager

The Fund Manager was registered by the Company Registry Court of the Budapest-Capital Regional Court under registration number Cg. 01-10-043959.

53. PARTICULARS OF THE DEPOSITARY

53.1 Name and legal form of the Depositary

The Depositary of the Fund is UniCredit Bank Hungary Zrt. Its legal form is private limited company.

53.2 Registered office of the Depositary

Registered office of UniCredit Bank Hungary Zrt.: H-1054 Budapest, Szabadság tér 5-6.

53.3 Company registration number of the Depositary

The Company was registered under number Cg. 01 10 041348 by the Company Registry Court of the Budapest-Capital Regional Court.

53.4 Tasks of the Depositary

Pursuant to Section 64(1) of the Collective Investments Act, the Fund Manager is required to commission the services of a depositary, which – pursuant to Section 64(3) of the Collective Investments Act – may be an institution defined in Section 4(1)(68)(b) of the Collective Investments Act.

Pursuant to Section 62(6) of the Collective Investments Act, in carrying out its role as Depositary of the Fund, the Depositary shall perform, in particular, the following services:

- a) safekeeping and administration in relation to the Fund's financial instruments deposited and documents embodying rights stemming from the financial instruments, and maintaining the account containing records on the securities of the Fund, the securities account, payment account and the client account;
- b) carry out the instructions received from the Fund Manager relating to the Fund's financial instruments, unless they are in conflict with any applicable law, or violate the Fund Management Policy;
- c) evaluate assets and liabilities, and determine the net asset value of the Fund on the aggregate and for each collective investment instrument;
- d) monitor the Fund's compliance with investment regulations laid down in the applicable law and in the Fund Management Policy;
- e) ensure that the sale, redemption and cancellation of collective investment instruments are carried out in accordance with the applicable law and the Fund Management Policy;
- f) ensure that in transactions involving the Fund's assets and in distributing collective investment instruments any consideration is remitted to the Fund within the usual time limits set according to fair market practice;
- g) ensure that the Fund's income is applied in accordance with the applicable law and the Fund Management Policy.

54. THE AUDITOR'S PARTICULARS AND DUTIES

The Fund's Auditor is Ernst & Young Könyvvizsgáló Korlátolt Felelősségű Társaság (company registration number: 01-09-267553, registered by the Company Court of Budapest-Capital Regional Court), registered office: H-1132 Budapest, Váci út 20. The person responsible for the audit is János Varga (Chamber of Auditors membership ID number: 007319).

The Auditor shall:

- carry out the review (audit) of the Fund's Annual Report and comment on it in the light of the audit in accordance with the applicable accounting rules, legislation applicable to the investment fund, and Act LXXV of 2007 on the Chamber of Hungarian Auditors, the Activities of Auditors, and on the Public Oversight of Auditors;
- carry out additional duties set out for the Auditor in legislation applicable to investment funds; thus, in particular, notify the Supervisory Authority in the cases defined in Section 194(1) of the Collective Investments Act, namely, of any fact of which the Auditor performing the audit of the investment fund has become aware that is liable to:
 - lead to a qualified or adverse audit opinion, or a disclaimer of opinion by the statutory auditor;
 - constitute a material breach of the laws, or the investment fund's Management Policy, or to forewarn any imminent infringement of such regulations;
 - constitute a material breach of the Collective Investments Act or other regulations, or of the internal regulations of the stock exchange, the clearing house or the central securities depository;
 - indicate that the investment fund manager's activities fail to guarantee the investors' interest;
 - result in a considerable difference of opinion between the Auditor and the management of the investment fund manager regarding issues affecting the solvency, income, data disclosure or accounting of the investment fund, which are considered essential from the point of view of operations.

be available for the Supervisory Authority also in any cases not listed above if the Supervisory Authority requests information from the Auditor.

55. PARTICULARS OF ANY ADVISOR

At this time, the Fund Manager does not engage any advisor whose remuneration is paid from the investment fund's assets.

56. THE DISTRIBUTORS' PARTICULARS AND DUTIES

56.1 Principal Distributor of the Fund

The Principal Distributor of the Fund is OTP Bank Plc., a credit institution providing comprehensive banking services. The company was registered under number 01-10-041585 by the Budapest Metropolitan Court as Court of Registration (currently: Company Registry Court of the Budapest-Capital Regional Court).

Duties of the Principal Distributor:

The Principal Distributor is required to carry out the distribution tasks related to the offering and continuous distribution of the Fund Units issued by the Fund, as defined by law, as well as in the Prospectus and the Fund Management Policy. These distribution tasks, pursuant to Sections 108(1)–(2) and 127(1)–(3) of the Collective Investments Act, include the sale and redemption of Fund Units, and making payments from the distributed capital gains and/or the Fund's capital embodied by the nominal value of the Fund Units. In relation to the above tasks, the Principal Distributor shall make available to investors, in the manner prescribed by law, the Fund's documents in effect for providing information to investors and the regular and extraordinary notices published on behalf of the Fund.

In addition to the above, the Principal Distributor has issued a statement – constituting Section 14 of the Fund's Prospectus – to the effect that the data and statements contained in the Prospectus are true to facts and do not conceal any facts or data that are relevant to the assessment of the securities concerned and the particular situation of the Issuer (i.e. the Fund), and that the Principal Distributor shall bear – together with the Fund Manager acting on behalf of OTP EUR Short Bond Fund issuing the Fund Units – joint and several liability to the holder of Fund Units for any damages arising from potential misleading information contained in the Prospectus or from the withholding of information.

56.2 Co-distributors of the Fund

UniCredit Bank Hungary Zrt.:

Registered office: H-1054 Budapest, Szabadság tér 5-6.
Company registration number: 01-10-041348

Concorde Értékpapír Zrt.

Registered office: H-1123 Budapest, Alkotás u. 50.
Company registration number: 01-10-043521

Raiffeisen Bank Zrt.:

Registered office: H-1133 Budapest, Váci út 116–118.
company registration number: 01-10-041042

SPB Befektetési Zrt.:

Registered office: H-1051 Budapest, Vörösmarty tér 7-8.
Company registration number: 01-10-044420

DSK Bank EAD – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: 1036 Sofia, 19 Moskovska St., Bulgaria
Company registration number: No 756/1999 - 121830616

Nova KBM d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: Ulica Vita Kraigherja 4, 2000 Maribor, Slovenia
Company registration number: No 5860580000

OTP banka d.d. – Continuous distribution of the Fund Units commences after passporting of the Fund.

Registered office: Split Domovinskog rata 61., Croatia
Company registration number: No 060000531

61. ANNEXES

Annex 1: Definitions

For the purposes of the Prospectus and the Fund Management Policy, the capitalised terms defined elsewhere in this Prospectus and Fund Management Policy shall have the meaning defined there, while the terms below shall have the following meaning:

AIFM:	alternative investment fund manager, i.e. an investment fund manager whose regular business is managing one or more AIFs (in respect of the Fund, the Fund Manager)
AIFM Regulation:	Commission Delegated Regulation (EU) No. 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU of the European Parliament and of the Council with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision
UCITS:	a) public, open-ended investment funds which comply with the provisions relating to UCITS set out in the Government Decree on the investment and borrowing policies of collective investment trusts, adopted by authorisation of the Collective Investments Act, or b) public, open-ended collective investment trusts created upon the national transposition of the provisions of the UCITS Directive into the laws of another EEA Member State
UCITS Manager:	an investment fund manager whose regular business is managing one or more UCITS
Fund:	OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
Fund Manager:	OTP Fund Management Ltd. (registered office: H-1026 Budapest, Riadó u. 1-3.)
Equity of the Fund:	at start, the equity of the Fund shall be the product of the nominal value and the number of its Fund Units, while during its activity it shall be equal to the aggregated net asset value of the Fund
Average Remaining Maturity Ratio:	the remaining average term of the securities in the portfolio of the Fund multiplied by their ratio in the equity of the Fund
Average remaining term ratio:	the remaining term to maturity of the securities in the portfolio of the Fund multiplied by their ratio in the equity of the Fund
Fund Unit:	investment units issued by the Fund
Investment Firms Act:	Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers and on the Regulations Governing their Activities
Dematerialised securities:	electronic instruments identifiably containing all material information of securities, which are recorded, transmitted and registered electronically as defined in the Capital Market Act and in specific other legislation
Supervisory Authority:	the Magyar Nemzeti Bank (“MNB”) acting in its capacity as the entity supervising the system of financial intermediation (“Supervisory Authority”)
Trading Settlement Day:	the day on which the value of purchase and redemption orders for collective investment instruments is established on the basis of the net asset value, for determining the consideration that is due to the investors at the time of settlement
Point of Sale:	the point(s) of sale of the Principal Distributor listed in Annexes 2.a and 2.b to the Prospectus, as well as the points of sale of the Hungarian Co-distributors listed in Annexes 2.c to 2.f to the Prospectus and of the Foreign Co-distributors listed in Annexes 2.g and 2.i to the Prospectus
Trading Day:	all banking business days during the term of the Fund except, in respect of distribution and redemption, the period of the temporary suspension of redemption [Sections 114–116 of the Collective Investments Act] and the discontinuation of distribution [Section 113 of the Collective Investments Act], and when the distributor’s customer service is suspended in respect of the distributor concerned

Trading Hours:	the time period during a Trading Day when the Distributor accepts purchase or redemption orders with a same-day value date at the relevant Point of Sale
Distribution Territory:	the territory of the states where the relevant series of the Fund Units are distributed (Hungary and the Foreign Distribution Territories)
Trading Payment Day:	the day on which the sum that is due to the investors after settlement is paid or credited to the investors
Distribution Territory:	the territory of the states where the relevant series of the Fund Units are distributed (Hungary and the Foreign Distribution Territories)
Distributor:	the Principal Distributor (OTP Bank Plc.) and the Co-distributors
Credit Institutions Act:	Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises
Collective Investments Act:	Act XVI of 2014 on the Collective Investment Trusts and their Managers and Amending Certain Finance Related Acts
Fund Management Policy:	the document laying down the special rules applicable to the management of the Fund, enclosed with the Prospectus as an Annex and constituting part thereof
Dual Banking Day:	a banking day in Hungary which, at the same time, also qualifies as a banking day in a foreign country in respect of the specific Foreign Distribution Territory
Currency of Issue and Settlement:	the currency in which the nominal value of the relevant series of the Fund Units is determined, and in which the price (purchase or redemption price) of the relevant series of the Fund Units must be paid; in the case of the Fund, EUR
Issuer:	the Fund
Banking Day Abroad:	each day when the conditions for the distribution of the relevant series of the Fund Unit are present in at least 50% of the Distribution Places of the Foreign Co-distributors involved in their trading in the Foreign Distribution Territory in question, i.e. when such Distribution Places are open for business
Trading Day Abroad:	with regard to a given Foreign Distribution Territory all Trading Days in Hungary during the term of the Fund which also qualify as Foreign Banking Days in respect of the given Foreign Distribution Territory, apart from any period of lawful suspension of distribution with regard to the Foreign Distribution Territory concerned
Foreign Distribution Territory:	The territory of each state (other than Hungary) where the relevant series of the Fund Unit is traded.
Foreign Co-distributor:	A Co-distributor performing distribution tasks in a Foreign Distribution Territory. Foreign Co-distributors are listed in Annexes 2.g and 2.i
Depository:	Pursuant to Section 62(1) of the Collective Investments Act, a credit institution incorporated in Hungary licensed to provide the safe custody services specified in Section 5(2)(b) of the Investment Firms Act and appointed by the investment fund manager to provide depository services in respect of the Fund managed by it; in this case, UniCredit Bank Hungary Zrt. (registered office: H-1054 Budapest, Szabadság tér 5–6.)
Banking Day in Hungary:	each day on which the Distributor is open for business (excluding the duration of any periods of closure authorised by the Supervisory Authority)
Trading Day in Hungary:	each Distribution Day in Hungary during the term of the Fund, except for the duration of any suspension of the distribution (Sections 114-116 of the Collective Investments Act).
Net Asset Value (NAV):	Value of the assets in the portfolio of the investment fund – including accrued and deferred assets and receivables from lending arrangements – less the total of all liabilities charged to the portfolio, including accrued expenses and deferred income
NAV calculator:	the person calculating the Net Asset Value and disclosing it to investors
Civil Code:	Act V of 2013 on the Civil Code
Benchmark Index:	Benchmark Index: 80% ICE BofaML 0-1Y All Euro Gov (EAAS)+20% ICE BofaML 1-3Y All Euro Gov (E1AS)

	The Benchmark Index components are included in the public register maintained by ESMA as specified in Article 36 of Regulation (EU) 2016/1011 of the European Parliament and of the Council on indices used to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014.
T-day:	the Trading Day for which the net asset value of the Fund is determined. In respect of the purchase and redemption orders placed for Fund Units, T-day is identical with the Trading Settlement Day and the Trading Payment Day
Co-distributor:	Any other Distributor, other than the Principal Distributor, trading the Fund Units pursuant to a contract concluded with the Principal Distributor and the Fund Manager.
Capital Market Act:	Act CXX of 2001 on the Capital Market
Principal Distributor:	the Distributor who is responsible for the distribution of the Fund Units in Hungary, i.e. OTP Bank Plc.

The meaning of other terms used in the Prospectus

Any terms that are included in the Prospectus or the Fund Management Policy but are not defined either under these Definitions or in any other sections of the Prospectus or the Fund Management Policy shall have the meaning defined in the Collective Investments Act or in the Capital Market Act.

Annex 2: List of Points of Sale

Annex 2.a List of Points of Sale of the Principal Distributor

(i) The OTPdirekt call centre and online service, the OTPdirekt Broker service, the OTP InternetBank service, the OTP MobileBank service, and the Private Banking call centre of OTP Bank Plc. The list of orders that can be placed through the listed services and the conditions of their use are published by the Principal Distributor in a separate announcement.

(ii) Branches of OTP Bank Plc. providing Securities services, available at <https://www.otpbank.hu/portal/hu/Kapcsolat/Fiokkereso>.

Annex 2.b Points of Sale of the Principal Distributor in respect of Series “I” Fund Units

The following branches of OTP Bank Plc.:

1131 BUDAPEST Madarász Viktor utca 12.
Central Branch

Annex 2.c: Points of Sale of UniCredit Bank Hungary Zrt. as Co-distributor

In respect of series “A” Fund Units:

The following branches of UniCredit Bank Hungary Zrt.:

Serial number	Address
1	2030 Érd, Budai út 13.
2	2040 Budaörs, Kinizsi u. 1-3.
3	1222 Budapest, Nagytétényi út 37-43. (Campona)
4	1024 Budapest, Margit krt. 87-89. (Mamut II.)
5	1036 Budapest, Lajos u. 48-66.
6	1239 Budapest, Hősök tere 14.
7	1028 Budapest, Hidegkúti út 167.
8	1039 Budapest, Heltai Jenő tér 15.
9	2316 Tököl, Hermina út 1-3.

10	1118 Budapest, Rétköz u. 5.
11	1117 Budapest, Hengermalom út 19-21.
12	1211 Budapest, II. Rákóczi Ferenc út 154-170.
13	1115 Budapest, Bartók Béla út 88.
14	1201 Budapest, Kossuth Lajos u. 32-36.
15	2092 Budakeszi, Fő u. 139.
16	1023 Budapest, Bécsi út 3-5.
17	1211 Budapest, Kossuth L. út 93.
18	1036 Budapest, Bécsi út 136. (Stop-Shop)
19	1097 Budapest, Könyves K. krt. 12-14. (Lurdy Ház)
20	1022 Budapest, Törökviszi út 30/a.
21	1123 Budapest, Alkotás út 1/A
22	1092 Budapest, Ferenc krt. 24.
23	2040 Budaörs, Szabadság út 49.
24	1111 Budapest, Lágymányosi u. 1-3.
25	1095 Budapest, Boráros tér 7.
26	1123 Budapest, Alkotás u. 50.
27	2310 Szigetszentmiklós, Bajcsy-Zsilinszky u. 26.
28	2000 Szentendre, Dobogókői út 1. (Városkapu Üzletház)
29	1117 Budapest Fehérvári út 23.
30	1191 Budapest Vak Bottyán út 75. a-c
31	1132 Budapest Váci út 20.
32	1102 Budapest, Körösi Csoma sétány 8.
33	1061 Budapest, Deák tér 6.
34	1042 Budapest, István út 10. (Újpesti Áruház)
35	1065 Budapest, Nagymező u. 44.
36	1088 Budapest, József krt. 13.
37	2220 Vecsés, Lincoln út 1.
38	1141 Budapest, Nagy Lajos király útja 214.
40	1165 Budapest Veres Péter út 105-107
41	1085 Budapest, József krt. 46.
42	1054 Budapest, Szabadság tér 5-6.
43	1191 Budapest, Üllői út 201. (Europark)
44	1182 Budapest, Üllői út 455.
45	1054 Budapest, Ferenciek tere 2.
46	1067 Budapest Teréz krt. 21.
47	1148 Budapest Örs Vezér tere 24. (SUGÁR)
48	1133 Budapest, Váci út 76
49	2120 Dunakeszi, Fő út 70.
50	1052 Budapest, Károly krt. 6.
51	1149 Budapest Bosnyák tér 5.
52	1135 Budapest, Lehel u. 70-76.
53	1149 Budapest, Fogarasi út 15/a
54	1073 Budapest, Erzsébet körút 56.
55	1053 Budapest, Fehérhajó u. 5.
56	1066 Budapest, Teréz krt. 62.
57	1103 Budapest, Gyömrői u. 99.
58	1152 Budapest, Szentmihályi út 137.
59	1182 Budapest, Üllői út 661.
60	1087 Budapest, Hungária krt. 40-44. (Arena Corner)
61	1138 Budapest, Váci út 178.

62	1076 Budapest, Thököly út 4.
63	1188 Budapest, Nagykőrösi út 49.
64	1054 Budapest, Alkotmány u. 4.
65	1093 Budapest, Vámház krt. 15.
66	8000 Székesfehérvár, Budai út 1.
67	8800 Nagykanizsa, Fő u. 8.
68	8900 Zalaegerszeg, Kossuth u. 1.
69	7100 Szekszárd, Arany J. u. 15-17.
70	8600 Siófok, Fő u. 174-176.
71	8400 Ajka, Szabadság tér 12.
72	2800 Tatabánya, Szent Borbála tér 2.
73	8200 Veszprém, Kossuth u. 6.
74	9400 Sopron, Várkerület 1-3.,
75	7621 Pécs, Rákóczi út. 17.
76	7400 Kaposvár, Dózsa György u. 1.
77	9021 Győr, Árpád út 45.
78	8360 Keszthely, Kossuth u. 41.
79	8900 Zalaegerszeg, Kovács Károly tér 1/A
80	8200 Veszprém, Ady Endre u. 1.
81	8000 Székesfehérvár, Palotai u. 4.
82	9700 Szombathely, Fő tér 26.
83	7400 Kaposvár, Áchim András u. 4. (Corsó Üzletház)
84	7030 Paks, Dózsa György út 63-73.
85	7621 Pécs, Rákoczi u. 58. (Árkád)
86	9600 Sárvár, Hunyadi u. 1.
87	9700 Szombathely, Kőszegi út 30-32.
88	8500 Pápa, Fő u. 25.
89	2800 Tatabánya, Győri út 7-9. (Vértess Center)
90	2500 Esztergom, Kossuth Lajos u. 14.
91	2400 Dunaújváros, Dózsa Gy. út 4/d.
92	9200 Mosonmagyaróvár, Fő u. 6.
93	9027 Győr, Budai u.1.
94	6600 Szentés, Kossuth u. 8.
95	4024 Debrecen, Kossuth Lajos u. 25-27.
96	6500 Baja, Tóth Kálmán tér 3.
97	5000 Szolnok, Kossuth Lajos utca 18.
98	4026 Debrecen, Kálvin tér 2/A.
99	6720 Szeged, Kárász u. 16.
100	3500 Miskolc, Széchenyi út 35.
101	2600 Vác, Szent István tér 4.
102	3100 Salgótarján, Rákóczi út 13.
103	5100 Jászberény, Szabadság tér 3.
104	6100 Kiskunfélegyháza, Kossuth u. 2.
105	3530 Miskolc, Hunyadi út 3.
106	3300 Eger, Bajcsy-Zs. u. 2.
107	4400 Nyíregyháza, Dózsa György út 1-3.
108	2700 Cegléd, Kossuth tér 4.
109	6800 Hódmezővásárhely, Andrássy u. 3.
110	6000 Kecskemét, Rákóczi út 4.
111	2100 Gödöllő, Dózsa György út 13.
112	3200 Gyöngyös, Páter Kiss Szaléz u. 22.
113	4200 Hajdúszoboszló, Szilfákalja u. 4.

114	5700 Gyula, Városház u. 12.
115	4400 Nyíregyháza, Nagy Imre tér 1. (Korzó Bevásárló kp.)
116	5600 Békéscsaba, Andrásy út 37-43. (Csaba Center)
117	3850 Tiszaújváros, Mátyás Király út 3.
118	6722 Szeged, Kossuth Lajos sugárút 18-20.
119	6000 Kecskemét, Kisfaludy u. 8.
120	5000 Szolnok, Baross Gábor út 27

In respect of series "I" Fund Units:

H-1054 Budapest, Szabadság tér 5-6.

Annex 2.d: List of Points of Sale of Concorde Értékpapír Zrt. as Co-distributor

In respect of series "A" Fund Units:

H-1123 Budapest, Alkotás u. 50.

Annex 2.e: List of Points of Sale of Raiffeisen Bank Zrt. as Co-distributor

In respect of series "A" Fund Units:

H-1133 Budapest, Váci út 116–118.

Annex 2.f: List of Points of Sale of SPB Befektetési Zrt. as Co-distributor

In respect of series "A" Fund Units

H-1051 Budapest, Vörösmarty tér 7-8.

Annex 2.g: List of Points of Sale of DSK Bank as Co-distributor (Continuous distribution of the Fund Units commences after passporting of the Fund)

Branch ID	Branch name	Address
0101	FC BLAGOEVGRAD	Blagoevgrad 2700, ul. "Todor Aleksandrov" №23
0901	FC KYUSTENDIL	Kyustendil 2500, ul. "Gorotsvetna" № 14
0106	FC PETRICH	Petrich 2850, ul. "Tsar Boris III" № 20
0905	FC DUPNITSA	Dupnitsa 2600, pl. "Svoboda" № 1
0108	BRANCH SANDANSKI	Sandanski 2800, ul. "Svoboda" № 5
1301	FC PERNIK	Pernik 2300, pl. "Krakra" № 1
0104	BRANCH GOTSE DELCHEV	Gotse Delchev 2900, ul. "Targovska" № 3
0107	OFFICE RAZLOG	Razlog 2760, ul. "Hristo Botev" № 1
0102	BRANCH BANSKO	Bansko 2770, ul. "Tsar Simeon" № 67
0201	FC BURGAS	Burgas 8000, ul. "Vasil Aprilov" № 12
2801	FC YAMBOL	Yambol 8600, ul. "Rakovski" № 1 A
0213	BRANCH NESEBAR	Nesebar 8230, ul. "Han Krum" № 11
0220	BRANCH BRATYA MILADINOV	Burgas 8000, zh.k. "Bratya Miladinovi" bl. 38
1901	FC SLIVEN	Sliven 8800, ul. "Dragan Tsankov" № 2A
0209	OFFICE POMORIE	Pomorie 8200, ul. "Targovska" № 2
0208	BRANCH TSAREVO	Tsarevo 8260, ul. "Han Asparuh" № 43
0203	BRANCH AYTOS	Aytos 8500, ul. "Stantsionna" № 31
0206	BRANCH KARNOBAT	Karnobat 8400, pl. "Georgi Dimitrov" № 3

1903	BRANCH NOVA ZAGORA	Nova Zagora 8900, pl. "Svoboda " № 1
2802	BRANCH ELHOVO	Elhovo 8700, ul. "Targovska" № 38
0301	FC VARNA	Varna 9000, bul. "Vladislav Varnenchik" № 53-55
2701	FC SHUMEN	Shumen 9700, ul. "Tsar Osvoboditel" № 102
2401	FC DOBRICH	Dobrich 9300, pl. "Svoboda" № 8
1801	FC SILISTRA	Silistra 7500, ul. "Simeon Veliki" № 50
0312	FC PRIMORSKI	Varna 9010, ul. "Druzhiba" № 2
0317	FC CHATALDZHA	Varna 9002, bul. "Chataldzha" № 35
2404	BRANCH KAVARNA	Kavarna 9650, ul. "Dobrotitsa" № 25
0307	BRANCH DEVNYA	Devnya 9160, ul. "Saedinenie" № 69
0313	OFFICE ASPARUHOVSKI	Varna 9003, ul. "Sredets" № 8
0306	BRANCH PROVADIA	Provadia 9200, Tsentralen ploshtad
2402	BRANCH BALCHIK	Balchik 9600, ul. "Cherno more" № 20
2703	BRANCH NOVI PAZAR	Novi Pazar 9900, ul. "Oborishte" № 10
2704	BRANCH VELIKI PRES LAV	Veliki Preslav 9850, ul. "Boris Spirov" № 70
0401	FC VELIKO TARNOVO	Veliko Tarnovo 5000, ul. "Tsar Osvoboditel" № 3
1701	FC RUSE	Ruse 7000, ul. "Aleksandrovska" № 4
0701	FC GABROVO	Gabrovo 5300, ul. "Nikolaevska" № 17
1601	FC RAZGRAD	Razgrad 7200, ul. "Sv. Sv. Kiril i Metodiy" № 19
2501	FC TARGOVISHT E	Targovishte 7700, pl. "Svoboda" № 2
0402	FC GORNA ORYAHOVITSA	Gorna Oryahovitsa 5100, ul. "Sv. Knyaz Boris I" № 2 A
1706	FC SVOBODA	Ruse 7000, pl. "Svoboda" № 5
0704	BRANCH SEVLIEVO	Sevlievo 5400, pl. "Svoboda" № 9
1707	BRANCH TSITADELA	Ruse 7004, ul. "Dorostol" № 36
0410	BRANCH SVISHTOV	Svishtov 5250, ul. "Aleko Konstantinov" № 15
1602	OFFICE ISPERIH	Isperih 7400, ul. "Vasil Levski" № 66
1702	OFFICE BYALA	Byala 7100, ul. "Vasil Levski" № 8
1401	FC PLEVEN	Pleven 5800, ul. "Vasil Levski" № 152
0501	FC VIDIN	Vidin 3700, ul. "Targovska" № 2
1101	FC MONTANA	Montana 3400, ul. "Treti mart" № 62
0601	FC VRATSA	Vratsa 3000, ul. "Hristo Botev" № 44
1001	FC LOVECH	Lovech 5500, ul. "Targovska" № 44
0605	BRANCH KOZLODUY	Kozloduy 3320, ul. "Sv. Sv. Kiril i Metodiy" № 1
1005	BRANCH TROYAN	Troyan 5600, ul. "Vasil Levski" № 1
1108	BRANCH LOM	Lom 3600, ul. "Panayot Volov" № 1
1402	BRANCH BELENE	Belene 5930, ul. "Bulgaria" № 23
1003	BRANCH LUKOVIT	Lukovit 5770, ul. "Vazrazhdane" № 78
1501	FC PLOVDIV	Plovdiv 4000, ul. "Hristo G. Danov" № 6
1502	FC PALDIN	Plovdiv 4000, ul. "Petko D. Petkov" № 23
1201	FC PAZARDZH IK	Pazardzhik 4400, ul. "Ekzarh Yosif" № 3
2001	FC SMOLYAN	Smolyan 4700, bul. "Bulgaria" № 26 A
1519	FC HRISTO BOTEV	Plovdiv 4004, ul. "Pere Toshev" № 3

1503	BRANCH ASENOVGRAD	Asenovgrad 4230, pl. "Akademik Nikolay Haytov" № 10
1509	BRANCH KARLOVO	Karlovo 4300, ul. "Vasil Levski" № 13
1205	BRANCH VELINGRAD	Velingrad 4600, ul. "Han Asparuh" № 46
1520	BRANCH SANKT PETERBURG	Plovdiv 4003, ul. "Stefan Botev" № 14
1525	BRANCH TRAKIA	Plovdiv 4000, zh.k. "Trakia", ul. "Nedyalka Shileva" № 11
1510	BRANCH STAMBOLIYSKI	Stamboliyski 4210, ul. "Osmi mart" № 3
1206	OFFICE PANAGYURISHTE	Panagyurishte 4500, ul. "Georgi Benkovski" № 12
1513	BRANCH RAKOVSKI	Rakovski 4150, ul. "Petar Bogdan" № 75 A
1512	BRANCH PARVOMAY	Parvomay 4270, ul. "Hristo Botev" № 1
1516	OFFICE HISAR	Hisar 4180, ul. "Ivan Vazov" № 23 A
2008	OFFICE CHEPELARE	Chepelare 4850, ul. "Kap. Petko Voyvoda" № 6
1207	OFFICE PESHTERA	Peshtera 4550, pl. "Bulgaria" № 1
3001	CORPORATE CENTER	Sofia 1000, ul. "Knyaz Aleksandar I" № 6
2105	FC MOSKOVSKA	Sofia 1036, ul. "Georgi Benkovski" № 5
2101	FC BATENBERG	Sofia 1000, ul. "Knyaz Aleksandar I" № 6
2112	FC MLADOST	Sofia 1784, zh.k. "Mladost 1", bul. "Aleksandar Malinov" № 40
2116	BRANCH GRAF IGNATIEV	Sofia 1142, ul. "Graf Ignatiev" № 62
2110	BRANCH DONDUKOV	Sofia 1504, bul. "Knyaz Al. Dondukov" № 86
2113	BRANCH ISKAR	Sofia 1528, zh.k. "Druzhiba" bul. "Iskarsko shose" № 7
2118	BRANCH GEO MILEV	Sofia 1111, bul. "Shipchenski prohod", bl. 240
2134	BRANCH SLATINA	Sofia 1574, bul. "Slatinska" bl. 47 B
2135	BRANCH OBORISHTE	Sofia 1505, ul. "Oborishte" № 74
2213	BRANCH SAMOKOV	Samokov 2000, pl. "Zahari Zograf"
2208	BRANCH IHTIMAN	Ihtiman 2050, ul. "Tsar Osvoboditel" № 120
2210	OFFICE KOSTENETS	Kostenets 2030, ul. "Targovska" № 2
2121	OFFICE DARVENITSA	Sofia 1756, bul. "Kliment Ohridski" № 13
2102	FC KALOYAN	Sofia 1000, ul. "Tsar Kaloyan" № 1
2103	FC SOFIA 3	Sofia 1000, bul. "Knyaz Al. Dondukov" № 5
2104	BRANCH PARCHEVICH	Sofia 1000, ul. "Parchevich" № 42
2106	FC SOFIA 6	Sofia 1618, ul. "Debar" № 1
2117	FC BELI BREZI	Sofia 1680, zh.k. "Beli brezi", bul. "Gotse Delchev" bl. 33-34
2109	FC LYULIN	Sofia 1359, zh.k. "Lyulin", bul. "Pancho Vladigerov", bl. 441
2136	BRANCH RAZSADNIKA	Sofia 1309, zh.k. "Ilinden" bl. 129-130 A
2132	BRANCH STOLETOV	Sofia 1233, bul. "Stoletov" № 108
2202	BRANCH BOTEVGRAD	Botevgrad 2140, pl. "Osvobozhdenie" № 15
2201	BRANCH OVCHA KUPEL	Sofia 1632, zh.k. "Ovcha kupel 1", bul. "Montevideo" № 37 do bl. 411

2207	BRANCH ETROPOLE	Etropole 2180, ul. "Mariyka Gavrilova" № 18A
2120	BRANCH IVAN VAZOV	Sofia 1408, bul. "Vitosha" № 176, bl. 53
2206	OFFICE ELIN PELIN	Elin Pelin 2100, bul. "Sofia" № 5
2214	BRANCH SVOGE	Svoqe 2260, ul. "Tsar Simeon" № 21
2301	FC STARA ZAGORA	Stara Zagora 6000, bul. "Mitropolit Metodiy Kusev" № 8
2601	FC HASKOVO	Haskovo 6300, pl. "Svoboda" № 9
0801	FC KARDZHALI	Kardzhali 6600, ul. "Omurtag" № 1
2303	FC KAZANLAK	Kazanlak 6100, bul. "Aleksandar Batenberg" № 4
2602	BRANCH DIMITROVGRAD	Dimitrovgrad 6400, bul. „Dimitar Blagoev” № 15
2607	BRANCH SVILENGRAD	Svilengrad 6500, bul. "Bulgaria" № 54
2305	BRANCH RADNEVO	Radnevo 6260, ul. "May" № 1
0804	OFFICE KRUMOVGRAD	Krumovgrad 6900, pl. "Bulgaria" № 9
2306	BRANCH CHIRPAN	Chirpan 6200, ul. "Georgi Dimitrov" № 28
2155	OFFICE BENKOVSKI	Sofia 1000, bul. "Knyaz Al. Dondukov" № 19
1415	OFFICE SAN STEFANO	Pleven 5800, ul. "San Stefano" № 9, blok "Yavor"
2410	OFFICE DAME GRUEV	Dobrich 9300, ul. "Dame Gruev" № 17
0231	OFFICE KNYAZ BORIS I	Burgas 8000, ul. "Knyaz Boris I" № 2
0328	OFFICE GALATEYA	Varna 9000, bul. "Hristo Botev" № 18
0805	BRANCH MOMCHILGRAD	Momchilgrad 6800, ul. "Kokiche" № 4
2310	OFFICE TOPOLOVGRAD	Topolovgrad 6560, ul. "Bulgaria" № 58
2302	BRANCH GALABOVO	Galabovo 6280, ul. "D-r Zhekov" № 8
1004	BRANCH TETEVEN	Teteven 5700, pl. "Parvi noemvri" № 29
2608	BRANCH HARMANLI	Harmanli 6450, pl. "Vazrazhdane" № 1
1302	BRANCH IZTOK	Pernik 2304, kv. "Iztok", ul. "Leninski prospekt" № 1
0810	OFFICE KIRKOVO	Kirkovo 6884, ul. "Georgi Kirkov" № 5
2502	OFFICE OMURTAG	Omurtag 7900, ul. "Tsar Osvoboditel" № 2
0705	OFFICE TRYAVNA	Tryavna 5350, ul. "Angel Kanchev" № 36
0408	BRANCH PAVLIKENI	Pavlikeni 5200, pl. "Svoboda" № 6
2503	BRANCH POPOVO	Popovo 7800, ul. "15-ti yanuari" № 1A
1603	BRANCH KUBRAT	Kubrat 7300, ul. "Nikola Vaptsarov" № 3
1526	OFFICE ZHIL. STROITELSTVO	Plovdiv 4000, bul. "Shesti septemvri" № 133 A
1406	BRANCH CHERVEN BRYAG	Cherven bryag 5980, ul. "Otets Paisiy" № 4
1305	OFFICE RADOMIR	Radomir 2400, pl. "Svoboda" № 1
0602	BRANCH BYALA SLATINA	Byala Slatina 3200, ul. "Kliment Ohridski" № 56
0608	BRANCH MEZDRA	Mezdra 3100, ul. "Georgi Dimitrov" № 1
3017	PBC PLOVDIV	Plovdiv 4000, ul. "Antim I" № 3
0110	OFFICE YAKORUDA	Yakoruda 2790, ul. "Sv. Sv. Kiril i Metodiy" № 40
1405	OFFICE NIKOPOL	Nikopol 5940, ul. "Elia" № 1

3026	PBC SVETA NEDELYA	Sofia 1000, bul. "Gen. E. I. Totleben" № 30-32
3025	PBC MOSKOVSKA	Sofia 1000, ul. "Moskovska" № 19
2003	BRANCH DEVIN	Devin 4800, ul. "Rodopi" № 4, bl. "Kolyu Ficheto" № 1
2006	OFFICE MADAN	Madan 4900, ul. "Yavor" № 1
2004	BRANCH ZLATOGRAD	Zlatograd 4980, ul. "Belovidovo" № 24
3027	PBC OBORISHTE	Sofia 1504, ul. "Oborishte" № 47
3029	PBC VARNA	Varna 9000, bul. "Saborni" № 42
3031	PBC BURGAS	Burgas 8000, zh.k. "Lazur" bl. 152
0235	OFFICE VELEKA	Burgas 8008, zh.k. "Izgrev" bl. 109 A
0222	BRANCH MEDEN RUDNIK	Burgas 8011, zh.k. "Meden rudnik", Targovski kompleks "Sara"
2140	OFFICE KV. LEVSKI	Sofia 1836, zh.k. "Levski-V" bl. 19, vh. G
1802	BRANCH DULOVO	Dulovo 7650, ul. "Vasil Levski" № 7
2144	OFFICE UNSS	Sofia 1700, Studentski grad "Hristo Botev" UNSS
2111	OFFICE NOVI ISKAR	Novi Iskar 1280, ul. "Iskarsko defile" № 107
2157	BRANCH BIZNES PARK SOFIA	Sofia 1715, zh.k. "Mladost 4", "Biznes park Sofia", sgrada 8
0802	OFFICE ARDINO	Ardino 6750, ul. "Bor" № 3
2609	OFFICE OTETS PAISIY	Haskovo 6300, ul. "Otets Paisiy" № 32
2312	OFFICE TSAR SIMEON	Stara Zagora 6000, bul. "Tsar Simeon Veliki" № 75
2403	BRANCH GENERAL TOSHEVO	Gen. Toshevo 9500, ul. "Georgi S. Rakovski" № 1
1803	BRANCH TUTRAKAN	Tutrakan 7600, ul. "Transmariska" № 6
0411	OFFICE STRAZHITSA	Strazhitsa 5150, ul. "Doncho Uzunov" № 6
0407	OFFICE LYASKOVETS	Lyaskovets 5140, ul. "Vasil Levski" № 2
2160	OFFICE ORLOV MOST	Sofia 1504, ul. "San Stefano" № 24
2215	OFFICE SLIVNITSA	Slivnitsa 2200, pl. "Saedinenie" № 2
1209	BRANCH SEPTEMVRI	Septemvri 4490, bul. "Bulgaria" № 59
2211	BRANCH KOSTINBROD	Kostinbrod 2230, ul. "Ohrid" № 11
1902	OFFICE KOTEL	Kotel 8970, ul. "Aleko Bogoridi" № 3
2124	BRANCH NADEZHDA	Sofia 1220, zh.k. "Nadezhda", bul. "Lomsko shose" № 2A
2212	BRANCH PIRDOP	Pirdop 2070, pl. "Todor Vlaykov" № 2
3501	BZ MSP SOFIA	Sofia 1124, bul. "Tsarigradsko shose" № 47 A
3502	BC MSP SOFIA	Sofia 1606, bul. "Gen. E. I. Totleben" № 30-32
3504	BC VARNA	Varna 9000, bul. "Vladislav Varnenchik" № 92
3503	BC PLOVDIV	Plovdiv 4000, ul. "Belgrad" 16
3507	BC VELIKO TARNOVO	Veliko Tarnovo 5000, ul. "Marmarliyska" № 37
3508	BZ VRATSA	Vratsa 3000, ul. "Hristo Botev" № 44
3509	BC PLEVEN	Pleven 5800, ul. "Vasil Levski" № 152
3511	BC STARA ZAGORA	Stara Zagora 6000, bul. "Mitropolit Metodiy Kusev" № 8

3512	BZ SLIVEN	Sliven 8800, ul. "Dragan Tsankov" № 2A
3505	BC BLAGOEVGRAD	Blagoevgrad 2700, ul. "Sv. Sv. Kiril i Metodiy" № 18A
3506	BC BURGAS	Burgas 8000, ul. "Adam Mitskevich" № 7
3510	BZ RUSE	Ruse 7000, ul. "Dobri Nemirov" № 7
3513	BZ HASKOVO	Haskovo 6300, ul. "Otets Paisiy" № 32
2172	OFFICE TSARITSA YOANNA	Sofia 1324, zh.k. "Lyulin 7", bul. "Dzhavaharlal Neru" № 12
3016	PBZ KLON SVOBODA	Ruse 7000, pl. "Svoboda" № 5
3010	PBZ FTS BLAGOEVGRAD	Blagoevgrad 2700, ul. "Todor Aleksandrov" № 3
3015	PBZ FTS VELIKO TARNOVO	Veliko Tarnovo 5000, ul. "Tsar Osvoboditel" № 3
3024	PBC STARA ZAGORA	Stara Zagora 6000, bul. "Mitropolit Metodiy Kusev" № 8
3028	PBZ FTS PLEVEN	Pleven 5800, ul. "Vasil Levski" № 152
3030	PBZ KLON KOZLODUY	Kozloduy 1331, ul. "Sv. sv. Kiril i Metodiy" №1
3033	PBZ BIZNES PARK SOFIA	Sofia 1332, zh.k. Mladost 4, "Biznes park Sofia", sgrada 8
3034	PBZ FTS HASKOVO	Haskovo 6300, ul. "Otets Paisiy" № 32
2174	FC FINANSOV TSENTAR 1	Sofia 1784, bul. „Tsarigradsko shose“ № 115 "Z"
2143	OFFICE DIANABAD	Sofia 1756, ul. "Lachezar Stanchev" № 5
2123	OFFICE VMA	Sofia 1606, ul. "Georgi Sofiyski" № 3
2175	OFFICE KAPITAL FORT	Sofia 1784, bul. "Tsarigradsko shose" № 90
2150	OFFICE MOL SOFIA	Sofia 1303, bul. "Al. Stamboliyski" № 101
2170	OFFICE SERDIKA TSENTAR SOFIA	Sofia 1505, bul. "Sitnyakovo" № 48
2314	OFFICE KAZANLAK- ZAPAD	Kazanlak 6103, ul. "23-ti Pehoten shipchenski polk" № 31
0315	FC VLADISLAV	Varna 9000, bul. "VI. Varnenchik" 92
0337	FC PRES LAV	Varna 9000, ul. "Preslav" 69
0338	FC ODESOS	Varna 9000, pl. "Slaveykov" 4/6
0341	OFFICE MLADOST BRIKOLAZH-PIKADILI	Varna 9009, bul. Slivnitsa 201
0342	BRANCH DELFIN	Varna 9000, ul. "Mladezhka" 141
0343	OFFICE YAN PALAH	Varna 9010, ul. "Yan Palah" 13
0344	OFFICE VINITSA	Varna 9022, kv. Vinitsa, ul. "Tsar Boris III" 26
0345	OFFICE ORBITA	Varna 9000, bul. „Osmi Primorski polk“ 100
0347	PBZ PRESTIZH VARNA	Varna 9000, ul. Preslav 69
0403	BRANCH TRAPEZITSA	Veliko Tarnovo 5000, ul. "Vasil Levski" 27
1704	OFFICE RUSE	Ruse 7000, ul. "Aleksandrovska" 1
0603	BRANCH VRATTSATA	Vratsa 3000, ul. Mito Tsvetkov 2
1418	BRANCH REPUBLIKA	Pleven 5800, ul. "Danail Popov" 4
1213	BRANCH TSAR SHISHMAN	Pazardzhik 4400, ul. "Tsar Shishman" № 6
1518	OFFICE SHIPKA	Plovdiv 4023, zh.k. Trakia, bul. Shipka 72 - targ. tsentar Sani

1530	BRANCH MARITSA	Plovdiv 4003, ul. "Belgrad" 16
1531	OFFICE VASIL APRILOV	Plovdiv 4000, bul. "Vasil Aprilov" 9
1521	BRANCH PODEM	Plovdiv 4003, bul. "Dunav" 51
1533	OFFICE MALCHIKA	Plovdiv 4002, ul. "Perushtitsa" № 15
0908	OFFICE DUPNITSA	Dupnitsa 2600, ul. "Nikolaevska" 2
2178	BRANCH LOZENETS	Sofia 1407, bul. "Lyubotran" 31
2114	OFFICE KRISTAL	Sofia 1000, ul. "6-ti septemvri" № 1
2180	OFFICE VITOSHA	Sofia 1000, bul. "Patriarh Evtimiy" 60
2183	OFFICE SREBARNA	Sofia 1407, ul. "Henrih Ibsen" 15 (sreshtu Paradise Mall)
2228	BRANCH LYULIN 6	Sofia 1336, zh.k. Lyulin 6, bl. 601
2229	BRANCH SERDIKA	Sofia 1202, bul. Knyaginya Maria Luiza 80
2230	OFFICE LOMSKO SHOSE	Sofia 1220, zh.k. Nadezhda 1, bul. "Lomsko shose", bl. 171
2231	OFFICE PAVLOVO	Sofia 1618, ul. "Tsar Boris III" 223
2232	OFFICE SVETA TROI TSA	Sofia 1309, zh.k. Sveta Troitsa, bul. "Slivnitsa" 228
2233	BRANCH STRELBISHT E	Sofia 1404, bul. Gotse Delchev 22
2107	FC STAMBOLIYSKI SOFIA	Sofia 1303, bul. "Al. Stamboliyski" 73
2182	OFFICE MADRID	Sofia 1504, ul. "Yanko Sakazov" 88
2184	BRANCH PLISKA	Sofia 1113, bul. "Tsarigradsko shose" 16, bl. 11
2186	BRANCH PODUENE	Sofia 1505, zh.k. Suha reka, kv. Poduene, ul. "Todorini kukli" 7
2226	OFFICE LETISHT E	Sofia 1540, bul. "Hr. Kolumb" 80, Astral Biznes Tsentar
2235	PBZ PRESTIZH SOFIA	Sofia 1303, bul. "Al. Stamboliyski" 73
2242	BRANCH TEHNICHESKI UNIVERSITET	Sofia 1700, ul. "Prof. Georgi Bradistilov" 16
2243	OFFICE TSARIGRADSKI KOMPLEKS	Sofia 1582, ZhK Druzhiba - 2, bl. 281, vh. A
0202	FC PRIMORIE	Burgas 8000, ul. "Sv.sv. Kiril i Metodiy" 12
0215	BRANCH PIRGOS	Burgas 8005, k-s. "Slaveykov" bl.46, parter
2307	BRANCH TRAYANA	Stara Zagora 6000, bul. "Tsar Simeon Veliki" 112
2318	OFFICE KAZANSKI	Stara Zagora 6000, bul. "Tsar Simeon Veliki" 2
0124	BRANCH TODOR ALEKSANDROV	Blagoevgrad 2700, bul. "Vasil Levski" № 49
1417	OFFICE STORGOZIA	Pleven 5802, zh.k. Storgozia, k-s "Teodoros"
2316	OFFICE BORUY	gr. Stara Zagora 6009, bul. "Tsar Simeon Veliki " № 157
1529	OFFICE RAYKO DASKALOV	gr. Plovdiv 4000, ul. "Rayko Daskalov" № 2
0237	OFFICE ZORNITSA	gr. Burgas 8018, zh.k. Zornitsa, bl.57 vh.B parter
0304	BRANCH DOLNI CHIFLIK	Dolni chiflik 9120, ul. "Kamchia" № 2
0316	BRANCH VLADISLAVOVO	Varna 9023, zh.k. "VI. Varnenchik" Bitov kombinat

2009	OFFICE DOSPA	Dospat 4831, ul. "Maltepe" № 3
2709	BRANCH MADARA	Shumen 9700, ul. "Pliska" № 36
2244	OFFICE NV TAUAR	Sofia 1700, bul. "G. M. Dimitrov" № 59
3002	BC SREDEN PAZAR	Sofia 1000, ul. "Tsar Kaloyan" № 1

Annex 2.h: List of Points of Sale of Nova KBM d.d. as Co-distributor (Continuous distribution of the Fund Units commences after passporting of the Fund)

Branches of Nova KBM d.d. available at <https://www.nkbm.si/branches-atm>.

Annex 2.i: List of Points of Sale of OTP banka d.d. (OTP Bank Croatia) as Co-distributor (Continuous distribution of the Fund Units commences after passporting of the Fund)

Branch name	Address	E-mail
PB office Zagreb	Jurišićeva 2, 10000 Zagreb	privatno.bankarstvo@otpbanka.hr
PB office Split	Ivana Gundulića 36, 21000 Split	privatno.bankarstvo@otpbanka.hr
PB office Zadar	Domovinskog rata 3, 23000 Zadar	privatno.bankarstvo@otpbanka.hr
PB office Rijeka	Jadranski trg 1, 51000 Rijeka	privatno.bankarstvo@otpbanka.hr

Annex 3: List of other investment funds managed by the Fund Manager

Open-end funds established for an indefinite term

OTP Palette Open-Ended Securities Fund (OTP Paletta Nyíltvégű Értékpapír Alap)
OTP New Europe Open-Ended Securities Fund (OTP Új Európa Nyíltvégű Értékpapír Alap)
Fund investing in OTP New Europe Euro Fund (OTP Új Európa Euró Alapba Fektető Alap)
OTP Russian Equity Fund (OTP Orosz Részvény Alap)
OTP Supra Derivative Investment Fund (OTP Supra Származtatott Befektetési Alap)
Fund investing in OTP Supra Euro Fund (OTP Supra Euró Alapba Fektető Alap)
Fund investing in OTP Supra Dollar Fund (OTP Supra Dollár Alapba Fektető Alap)
OTP Turkish Equity Fund (OTP Török Részvény Alap)
OTP Africa Equity Fund (OTP Afrika Részvény Alap)
OTP Fundman Equity Fund (OTP Fundman Részvény Alap)
OTP EMDA Derivative Fund (OTP EMDA Származtatott Alap)
Fund investing in OTP EMDA Euro Fund (OTP EMDA Euró Alapba Fektető Alap)
OTP EMEA Bond Fund (OTP EMEA Kötvény Alap)
OTP “Treasures of Earth” Derivatives Commodity Market Fund (OTP Föld Kincsei Származtatott Árupiaci Alap)
Fund of OTP Omega Developed Market Equity Funds (OTP Omega Fejlett Piaci Részvény Alapok Alapja)
Fund of OTP Planet Emerging Market Equity Funds (OTP Planéta Feltörekvő Piaci Részvény Alapok Alapja)
OTP Quality Open-Ended Equity Fund (OTP Quality Nyíltvégű Részvény Alap)
OTP Exchange-Traded BUX Index-Tracking Fund (OTP Tőzsdén Kereskedett BUX Indexkövető Alap)
Fund of OTP Asian Real Estate and Infrastructure Securities Funds (OTP Ázsiai Ingatlan és Infrastruktúra Értékpapír Alapok Alapja)
OTP Climate Change Equity Fund (OTP Klímaváltozás Részvény Alap)
OTP Central European Equity Fund (OTP Közép-Európai Részvény Alap)
OTP Trend International Equity Fund (OTP Trend Nemzetközi Részvény Alap)
OTP Absolute Yield Open-Ended Derivative Fund (OTP Abszolút Hozam Nyíltvégű Származtatott Alap)
Fund investing in OTP Absolute Yield Euro Fund (OTP Abszolút Hozam Euró Alapba Fektető Alap)
Fund of OTP Premium Euro Funds (OTP Prémium Euró Alapok Alapja)
Fund of OTP Premium Balanced Funds (OTP Prémium Kiegyensúlyozott Alapok Alapja)
Fund of OTP Premium Classic Funds (OTP Prémium Klasszikus Alapok Alapja)
Fund of OTP Premium Derivatives Funds (OTP Prémium Származtatott Alapok Alapja)
Fund of OTP Premium Derivatives Euro Funds (OTP Prémium Származtatott Euró Alapok Alapja)
Fund of OTP Premium Growth Funds (OTP Prémium Növekedési Alapok Alapja)
OTP Premium Money Market Fund (OTP Prémium Pénzpiaci Alap)
Fund of OTP Premium Trend Classic Funds (OTP Prémium Trend Klasszikus Alapok Alapja)
Fund of OTP Premium Active Classic Funds (OTP Prémium Aktív Klasszikus Alapok Alapja)
OTP USD Short Bond Fund (OTP Dollár Rövid Kötvény Alap)
OTP EUR Short Bond Fund (OTP Euró Rövid Kötvény Alap)
OTP Optima Capital-Guaranteed Bond Fund (OTP Optima Tőkegarantált Kötvény Alap)
OTP Capital-Guaranteed Short Bond Fund (OTP Tőkegarantált Rövid Kötvény Alap)
OTP Maxima Bond Fund (OTP Maxima Kötvény Alap)

OTP Sigma Open-Ended Derivative Fund (OTP Sigma Nyíltvégű Származtatott Alap)
 Fund investing in OTP Spectra Fund (OTP Spectra Alapba Fektető Alap)
 OTP Meta Global Bond Fund (OTP Meta Globális Kötvény Alap)
 Fund investing in OTP Target Date 2025 Fund (OTP Céldátum 2025 Alapba Fektető Alap)
 OTP Céldátum 2030 Alapba Fektető Alap (Fund investing in OTP Target Date 2030 Fund)
 OTP Céldátum 2035 Alapba Fektető Alap (Fund investing in OTP Target Date 2035 Fund)
 OTP Céldátum 2040 Alapba Fektető Alap (Fund investing in OTP Target Date 2040 Fund)
 OTP Céldátum 2045 Alapba Fektető Alap (Fund investing in OTP Target Date 2045 Fund)
 Fund investing in OTP Target Date 2050 Fund (OTP Céldátum 2050 Alapba Fektető Alap)
 OTP Western European Equity Fund (OTP Nyugat-Európai Részvény Alap)
 Fund of OTP Multi-Asset Conservative Funds (OTP Multi-Asset Konzervatív Alapok Alapja)
 Fund of OTP Multi-Asset Balanced Funds (OTP Multi-Asset Kiegyensúlyozott Alapok Alapja)
 Fund of OTP Multi-Asset Dynamic Funds (OTP Multi-Asset Dinamikus Alapok Alapja)
 OTP Terra Commodity Market Fund (OTP Terra Árupiaci Alap)
 OTP Strategic Euro Bond Fund (OTP Stratégiai Euró Kötvény Alap)

Closed-end funds

OTP Energy Trend Yield-Guaranteed Closed-End Fund (OTP Energiatrend Hozamvédett Zártvégű Alap)
 OTP Megatrend Yield-Guaranteed Closed-End Fund (OTP Megatrend Hozamvédett Zártvégű Alap)
 OTP Megatrend II Yield-guaranteed Closed-end Fund (OTP Megatrend II. Hozamvédett Zártvégű Alap)
 OTP Ecotrend Yield-Guaranteed Closed-End Fund (OTP Ökotrend Hozamvédett Zártvégű Alap)

Private funds

OTP Private Institutional Equity Fund (OTP Zártkörű Intézményi Részvény Alap)
 Fund of OTP Private Developed Market Equity Funds (OTP Zártkörű Fejlett Piaci Részvény Alapok Alapja)
 Fund of OTP II Closed-End Emerging Market Equity Funds (OTP II. Zártkörű Feltörekvő Piaci Részvény Alapok Alapja)
 OTP II Private Bond Fund (OTP II. Zártkörű Kötvény Alap)
 OTP Private Euro Bond Fund (OTP Zártkörű Euró Kötvény Alap)
 Fund investing in OTP Private Global Absolute Yield Fund (OTP Zártkörű Globális Abszolút Hozam Alapba Fektető Alap)
 Fund investing in OTP "Stalice" Private Fund (OTP Szikvirág Zártkörű Alapba Fektető Alap)