



**PROSPECTUS ON
VIG PANORAMA
TOTAL RETURN
INVESTMENT FUND**

FUND MANAGEMENT COMPANY
VIG ASSET MANAGEMENT HUNGARY CLOSED COMPANY LIMITED BY SHARES
(H-1091 BUDAPEST, ÜLLŐI ÚT 1.)

CUSTODIAN
Citibank Europe plc's Hungarian branch
(1133 BUDAPEST, VÁCI ÚT 80.)

EFFECTIVE AS OF:

MAY 16., 2023.

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DEFINITION OF TERMS

UCITS	undertakings for the collective investment in transferable securities
UCITS Fund Manager	an investment fund management company managing one or more UCITSs as regular business
UCITS Directive	Directive 2009/65/EC on undertakings for collective investment in transferable securities
Fund	VIG Panorama Total Return Investment Fund
Base currency	HUF, i.e. Hungarian Forint. It is the currency in which the Fund records its assets. The Fund may even invest a portion of its assets in securities issued in any other currency than its base currency.
Crystallisation frequency	the frequency at which the accrued performance fee, if any, becomes payable to the management company.
Excess performance (relative return)	the difference between the net performance of the investment unit series and the benchmark.
Fund Management Company	VIG Asset Management Hungary Closed Company Limited by Shares
ÁKK	Államadósság Kezelő Központ Zártkörűen Működő Részvénytársaság (Government Debt Management Agency Public Ltd in Hungary)
High-on-High (HoH) model	a performance fee model whereby the performance fee may only be charged if the NAV exceeds the NAV at which the performance fee was last crystallised.
Hurdle rate	a predefined minimum fixed rate of return.
Investment Fund	a collective investment form set up under the conditions defined in Act XVI of 2014 on collective investment forms and their managers (Collective Investment Act)
Investment unit	a transferable security issued in series by the Investment Fund as issuer in the manner and with formalities defined in the Collective Investment Act, providing receivables and other rights against the investment fund as defined in the fund rules of the investment fund

Investor	the holder of the investment unit or any other collective investment security
Target country	a country on the capital market of which the Fund makes investment or intends to make investment strategically
Dematerialized security	It is an aggregate of data created, recorded, transmitted and registered in electronic way, in the manner as defined in the Capital Market Act and in special law, containing the content requirements of a security in identifiable manner
EU	European Union
EEA member state	any member state of the European Union and any other states being parties to the Agreement on the European Economic Area
Supervisor	National Bank of Hungary (earlier: Hungarian Financial Supervisory Authority)
FIFO Principle	the first purchase of a specific security in the portfolio is sold first
Distributor	The Fund Management Company and further distributors participating in the sale of Investment units. For current list of distributors see item 1.6 of the Prospectus.
Distribution sites	Sites appointed by the Distributor for sale of the Investment units of the Investment units of the Fund. The list of distribution sites is accessible at the website of the Fund Management Company: https://vigam.hu/
Distribution day	all business days in Hungary for which day the net asset value is stated, except the events of suspension or interruption of the distribution.
G20	G20 is an organisation comprising the world's 19 largest economies and the European Union.
Collective Investment Act	Act XVI of 2014 on collective investment forms and their managers, and on the amendment of certain financial laws
Fund rules	a regulation containing special rules of the Fund, prepared pursuant to the Collective Investment Act, specifying the general contract conditions between the Fund Management Company and the Investors
Auditor	PricewaterhouseCoopers Könyvvizsgáló Kft.
Publication sites	websites https://vigam.hu/ and https://www.kozzetetelek.hu/
Performance fee settlement	establishment of the fact that the performance fee that has accrued in the net asset value of the Fund as at the last day of distribution (or of termination of the fund or series) of the year is positive, with this performance fee then being paid by the Fund
Custodian	Citibank Europe plc's Hungarian branch

Order	Order to buy, redeem or switch investment units
MNB	National Bank of Hungary
Net asset value	value of assets in the portfolio of the investment fund, including receivables from lending, reduced by total liabilities encumbering the portfolio, including the accrued expenses
OECD	Organisation for Economic Co-operation and Development
Civil Code	Act V of 2013 on the Civil Code
Own capital	the own capital of the Investment Fund is equal to the product of multiplication of the nominal value and the piece number of the investment units; in the course of its operation, own capital is identical with the aggregate net asset value of the Investment Fund
Series	In the name of an investment fund investment units can be issued that constitute one or more series, have the same nominal value within the same series and incorporate the same rights. The Fund rules and the Prospectus determines in details the characteristics of the individual series by which they deviate from each others.
SFDR Regulation (Sustainable Finance Disclosure Regulation)	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
Taxonomy regulation	Regulation (EU) 2020/852 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 18 June 2020 establishing a framework for the promotion of sustainable investment and amending Regulation (EU) 2019/2088
Prospectus	a document prepared according to the Collective Investment Act for public issue of Investment units
T day	the date of placing an order for making a deal
Capital Market Act	Act CXX of 2001 on Capital Markets
Client account	an account kept for a client, which is exclusively aimed at the execution of orders placed to the debit of the balance of the investment service, commodity exchange service and the payment based on the liability included in the security.

I. Information regarding the Investment Fund

1. Basic data of the Investment Fund

1.1. Name of the Investment Fund

VIG Panoráma Total Return Befektetési Alap

English name: VIG Panorama Total Return Investment Fund

Czech name: VIG Panorama Total Return Fond

1.2. Short name of the Investment Fund

VIG Panorama Fund

1.3. Seat of the Investment Fund

H-1091 Budapest, Üllői út 1.

1.4. Name of the Investment Fund Management Company

VIG Asset Management Hungary Closed Company Limited by Shares .

1.5. Name of the Custodian

UniCredit Bank Hungary Zrt.

1.6. Name of the Distributor

VIG Asset Management Hungary Closed Company Limited by Shares

further distributors:

Budapest Bank Zrt.

CIB Bank Zrt.

Concorde Értékpapír Zrt.

Conseq Investment Management, a. s.

ERSTE Befektetési Zrt.

Equilor Befektetési Zrt.

OTP Bank Nyrt.

Raiffeisen Bank Zrt.

SPB Befektetési Zrt.

MTB Magyar Takarékszövetkezeti Bank Zrt.

UniCredit Bank Hungary Zrt.

1.7. Operating form of the Investment Fund (private or public)

The Investment Fund is public.

1.8. Type of the Investment Fund (open-end or closed-end)

The Investment Fund is open-end.

1.9. Duration of the Investment fund (unlimited or limited); if the duration is limited, indicate the expiry date of the duration

The Investment Fund has an unlimited duration.

1.10. Indicate whether the Investment Fund is a fund harmonized according to the UCITS Directive.

The Investment Fund is harmonized according to the UCITS Directive.

1.11. Number, marking of the series issued by the Investment Fund; indicate the characteristics of the individual series by which they differ from each other

Series	Difference
VIG Panoráma Fund („A” series HUF)	fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („C” series CZK)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („CI” series CZK)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („E” series EUR)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („EI” series EUR)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („I” series HUF)	fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („P” series PLN)	currency, currency-hedged series, fund management fee, distributors, hurdle rate
VIG Panoráma Fund („R” series HUF)	fund management fee rate, distributors, free of penalty fee, hurdle rate
VIG Panoráma Fund („U” series USD)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate
VIG Panoráma Fund („UI” series USD)	currency, currency-hedged series, fund management fee rate, distributors, hurdle rate

1.12. Primary asset category type of the investment fund (securities or real estate fund)

The Investment Fund is a securities fund.

1.13. Indicate if the pledge for protecting the capital of the investment fund and/or for the return is secured by a bank guarantee or a surety assurance (capital and/or return guarantee) or it is supported by the detailed investment policy of the investment fund (capital and/or return protection); state the item in the fund rules that contains the conditions for it in details.

Not applicable.

1.14. Other information regarding the relevant subject

Distributors:

The Fund Management Company distributes all investment unit series of the Fund. The distributors listed in item 1.7 of the Fund rules can distribute the Investment Fund series of the Fund within the scope of their distribution contracts entered into with the Fund Management Company, according to their own Business Regulations.

Distributors shall determine the conditions for the distribution of the Fund in their own Business Rules, but these conditions may not contradict the provisions of the Fund Rules.

Distribution abroad:

Following the notification procedure of the Fund, the Investment unit series of the Fund become accessible even abroad. The Fund rules contain the special conditions for distribution abroad, which are highlighted in the relevant items.

2. Decisions regarding the Investment Fund

2.1. Depending on the operating form and type of the investment fund, the date of acceptance of the Fund rules, the Prospectus, the Key Investor Information Document and the Announcement by the Fund Management Company or its statement thereto, the number of the decision of the Fund Management Company (by issues, i.e. by series)

Series	BoD Resolution No	Date of BoD Resolution
VIG Panoráma Fund „A” series HUF	10/2014.	12.9.2014.
VIG Panoráma Fund „C” series CZK	15/2022.	28.7.2022.
VIG Panoráma Fund „CI” series CZK	15/2022.	28.7.2022.
VIG Panoráma Fund „E” series EUR	10/2014.	12.9.2014.
VIG Panoráma Fund „EI” series EUR	1/2022.	28.1.2022.
VIG Panoráma Fund „I” series HUF	10/2014.	12.9.2014.
VIG Panoráma Fund „P” series PLN	10/2014.	12.9.2014.
VIG Panoráma Fund „R” series HUF	10/2014.	12.9.2014.
VIG Panoráma Fund „U” series USD	10/2014.	12.9.2014.
VIG Panoráma Fund „UI” series USD	1/2022.	28.1.2022.

2.2. Depending on the operating form and type of the investment fund, the number and date of the Supervisory Authority Decision on the approval of the Fund rules, the Prospectus, the Key Investor Information Document and the Announcement on authorization of public issue (by series)

Series	Number of Supervisory Authority Decision	Date of Supervisory Authority Decision
VIG Panoráma Fund „A” series HUF	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „C” series CZK	H-KE-III-/2022.	2022.
VIG Panoráma Fund „CI” series CZK	H-KE-III-/2022.	2022.
VIG Panoráma Fund „E” series EUR	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „EI” series EUR	H-KE-III-179/2022.	18.3.2022.
VIG Panoráma Fund „I” series HUF	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „P” series PLN	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „R” series HUF	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „U” series USD	H-KE-III-661/2014.	30.10.2014.
VIG Panoráma Fund „UI” series USD	H-KE-III-179/2022.	18.3.2022.

2.3. Number and date of the decision on registration of the Investment Fund by the Supervisory Authority

H-KE-III-716/2014.	27.11.2014.
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2.4. Registration number of the Investment Fund in the register kept by the Supervisory Authority

1111-586

2.5. Depending on the operating form and type of the Investment Fund, the numbers and dates of decisions of the Fund Management Company on the amendment of the Fund rules, the Prospectus and the Key Investor Information Document

BoD Resolution No	Date of BoD Resolution
7/2015.	31.7.2015.
24/2021.	7.10.2021.
26/2021	8.10.2021.
30/2021	16.11.2021.
33/2021	22.11.2021.
15/2022.	28.7.2022.
25/2022.	11.10.2022.

2.6. Numbers and dates of Supervisory Authority decisions on the approval of amendment of the Fund rules

Number of Supervisory Authority Decision	Date of Supervisory Authority Decision
H-KE-III-840/2015.	29.9.2015.
H-KE-III-715/2021.	29.11.2021.
H-KE-III-550/2022.	21.9.2022.
H-KE-III-785/2022.	19.12.2022.

2.7. Other information regarding the relevant subject

Not applicable.

3. Risk profile of the Investment Fund

3.1. Purpose of the Investment Fund

The objective of the Fund is to achieve a return in excess of the benchmark index through the positions it takes and the exchange rate movements. The Fund seeks to choose from the different investment schemes with the greatest possible freedom and without any industry or geographical specification.

3.2. Profile of the characteristic investor who are targeted with the investment units of the Investment Fund are

The Fund is primarily targeted to Investors who intend to invest at least for the proposed minimum investment period and who find the value indicated on a scale ranging from 1 to 7 on the risk/profit profile acceptable in comparison to their risk-bearing appetite.

Series	Proposed minimum investment period	Risk rating
VIG Panoráma Fund A series	3 years	3 (moderate)
VIG Panoráma Fund C series	3 years	3 (moderate)

VIG Panoráma Fund CI series	3 years	3 (moderate)
VIG Panoráma Fund E series	3 years	3 (moderate)
VIG Panoráma Fund EI series	3 years	3 (moderate)
VIG Panoráma Fund I series	3 years	3 (moderate)
VIG Panoráma Fund P series	3 years	3 (moderate)
VIG Panoráma Fund R series	3 years	3 (moderate)
VIG Panoráma Fund U series	3 years	3 (moderate)
VIG Panoráma Fund UI series	3 years	3 (moderate)

3.3. The asset categories in which the Investment Fund can invest, with special reference to the fact whether the application of derivative transactions is permitted for the Investment Fund

The Fund may invest in equities, bonds, investment funds and other securities, in addition to which it may also conclude derivative transactions. The Fund may also conclude deposit and repo transactions.

3.4. Call attention to the item of the Fund rules of the Investment Fund that contains presentation of the risk factors of the Investment Fund

The risk factors of the Investment Fund are contained in Item 26 of the Fund rules

3.5. The purpose (implementation of coverage or investment purposes) and possible effect of application of derivative transactions on the development of risk factors

The Fund uses derivatives for efficient portfolio management in order to achieve its investment objectives. On behalf of the Fund, the Management Company is allowed to enter into derivative transactions only for the purpose of achieving the investment goals formulated in the Fund rules, for investment assets. Due to their nature, the derivative transactions bear much higher risks than those investment forms that do not require any leverage. Using proper investment techniques, these risks may be reduced, but they cannot be fully excluded.

The Fund Manager may conclude derivative transactions for investment instruments on behalf of the Fund solely for the purpose of achieving the investment objectives set out in the Management Regulations. Derivatives by their very nature involve much higher risks, which can be mitigated by appropriate investment techniques but cannot be completely eliminated.

3.6. If, on the basis of its investment policy, the consolidated risk exposure of the investment fund against a specific institution, which risk exposure arises from investments in transferable securities or money market instruments issued by that institution, from deposits at that institution and from unlisted derivative transactions, may exceed 20 percent of the assets of the investment fund, call attention to the special risks arising therefrom

In accordance with Section 8 (4) of Government Decree 78/2014, the consolidated risk exposure of the Fund cannot exceed 20% of the assets of the Fund.

3.7. If the Investment Fund mainly invests in asset categories not belonging to the transferable securities or financial instruments or adapts a certain index, call attention to this element of the investment policy of the Investment Fund

Not applicable.

3.8. In the event that, due to the possible composition of the portfolio or to the applicable management technique, the net asset value of the Investment Fund may strongly fluctuate, call attention to this fact

Not applicable.

3.9. If, based on the authorisation of the Supervisory Authority, the Investment Fund may invest even 100% of its assets in various transferable securities and money market instruments issued by an EEA Member State, its self-government, by a third country or an international organization in which one or several member states are members, call attention to this fact

Taking into account the intended proportions of each portfolio element as set out in the Management Regulations, the Fund may invest up to 100% of its assets in government securities issued by EU, OECD or G20 countries.

3.10. Other information regarding the relevant subject

The Fund has no benchmark. In calculating the performance fee, the Fund Manager applies a minimum return limit, which does not represent a specific promise of return.

Results of the assessment of the probable impact of the sustainability risk on the return of the offered financial product:

(disclosure as per Article 6 (1) a) of the SFDR):

The return of financial products offered by the Fund Manager, like that of investment funds, may be impacted by sustainability risks (e.g. climate risk, transition risk, extra costs due to the use of fossil fuels). These effects generally occur within a longer investment period, up to 10 years or more, and regarding their results, they may even have a significant impact on the return of a given financial product, thereby possibly deteriorating their performance. (For example, due to increased attention on environmental considerations, a company operating in a given sector, may be subject to a disadvantage if it fails to switch from a “traditional” operating model to a more modern and environmentally sustainable operation method). The above can typically impact the given company’s market perception, and thus its market value in the long run, which factor is duly taken into account by the Fund Manager in the course of the asset selection decisions.

The degree of sustainability risks may differ for each financial product, which the Fund Manager continuously monitors and duly informs investors, as required by law.

In the case of the Fund, the Fund Manager hereby informs investors that the portfolio does not fall into the category of a financial product that promotes specific environmental or social characteristics or a combination thereof as defined in the SFDR Regulation (EU 2019/2088) or a financial product aimed at a sustainable investment. In selecting the investments upon which this financial product is based, the Fund Manager does not take into account the specific EU criteria for environmentally “sustainable” business activities (Taxonomy Regulation, EU 2020/852), as this product does not intend to meet enhanced sustainability criteria.

4. Accessibility of information to the investors

4.1. Naming of the place where the prospectus, the fund rules, the key investor information document, the reports serving regular information as well as the announcements designed for extraordinary information, including the information regarding payments to the investors and redemption of investment units can be accessed

The Fund Management Company publishes all regular or extraordinary information and announcements regarding the Fund at the official Publication sites of the Fund. The official Publication sites of the Fund are the websites <https://kozzetelek.mnb.hu> and <https://vigam.hu/>.

The public Prospectus as well as the Key Investor Information Document prepared for public issue of the investment units of the Fund can be inspected at the distribution sites and in the headquarters of the Fund Management Company.

4.2. Other information regarding the relevant subject

Not applicable.

5. Taxation information

This information has been compiled in accordance with the applicable legislation. The date of the last amendment of the Prospectus is – in accordance with Section 164 (1) bn) of the Kbtv. [the Hungarian act on collective investment forms] – included in the investment fund register maintained by the MNB [National Bank of Hungary], which is available on the MNB's website at <https://intezmenykereso.mnb.hu>. The current legislation may change after the Prospectus has been written; it is the Investor's responsibility to read and to be aware of the relevant regulations in force before purchasing the investment units. The Fund Manager shall not be liable for any damage caused to Investors due a lack of knowledge on their part of the applicable tax laws. Should the investors have to pay withholding tax on the returns they earn on the investment units, i.e. on price gains, due to changes in the tax regulations, the Fund Manager and the Distributor shall not be responsible for deducting such withholding tax.

Distribution abroad: The Fund Management Company calls the investors' attention to the fact that detailed review of the taxation laws is essential in making their investment decision and to the fact that in case of sale to a foreign country, the taxation rules may be different.

5.1. Summary of elements of the taxation scheme applicable to the investment fund that can be relevant for the investors

At the time of preparation of the Prospectus, the profit of the Fund is not encumbered with any tax payment liability in Hungary. If interest rate, dividend or price returns and any other possible income arises on foreign investments, it may occur that tax is charged on these gains in the source country (in the country where the gain arises). The taxation of gains arising on foreign investments is determined by the internal laws of the relevant country and, if appropriate, the convention for the avoidance of double taxation between the relevant country and Hungary.

At the time of preparation of this Prospectus the investment units. The tax base is quarterly the average asset value of the investment unit series of the Fund and the annual tax rate is 0.05% if the tax base. The tax payable is assessed, collected from the Fund, declared and paid by the Fund Management Company.

5.2. Information on the deduction encumbering the yield and price return paid to the investors

- a) According to the Hungarian legislation effective at the time of preparation of the Prospectus, the rate of interest tax payable to domestic private persons on the return of Investment units is 15%, which is deducted by the distributor when they are sold. The investment units can be deposited on a long-term investment account on the return of which the distributor does not deduct any tax.
- b) According to the Hungarian legislation effective at the time of the Prospectus, the return of Investment units may increase/reduce the taxable revenues of domestic legal persons and business associations without legal personality on which, pursuant to the taxation rules in effect, they have to pay tax. At the time of preparation of the Prospectus, the corporate tax rate is 9% respectively. If, upon request of the Investor, the return of the Investment unit is broken down, then corporate tax has to be paid only on the price return and interest component of the return but not on the portion of return that results from dividends.
- c) Taxation of foreign private persons, legal persons and business association without legal personality: If there is a convention on avoidance of double taxation between Hungary and the own country for taxation of the investment unit holder, then the taxation of the income is

subject to the domestic laws, i.e. the laws of his own country. In lack of such a convention, the Hungarian tax rules applicable to non-residents apply. The Distribution fulfils the tax deduction obligation on the basis of the relevant taxation convention and the domestic taxation rules.

II. Information regarding issue of investment units

6. Issue of investment units

Not applicable.

III. Detailed information regarding intermediate bodies

7. Information regarding the investment fund management company

The Fund Management Company manages both UCITS funds and alternative investment funds (AIF).

7.1. Name and company form of the Investment Fund Management Company

VIG Asset Management Hungary Closed Company Limited by Shares

7.2. Seat of the Investment Fund Management Company

H-1091 Budapest, Üllői street 1.

7.3. Registration number of the Investment Fund Management Company

Cg. 01-10-044261

7.4. Date of foundation of the investment fund management company, if the company is founded for a limited period, indicate the period

29 November 1999

7.5. If the investment fund management company manages other investment funds as well, list of them

VIG Alfa Absolute Return Investment Fund, VIG Emerging Market ESG Equity Funds VIG BondMaxx Total Return Bond Investment Fund, VIG Central European Equity Fund, VIG Hungarian Bond Fund, VIG Emerging Europe Bond Fund, Developed Market GovernmentBond Fund, VIG Opportunity Equity Fund, VIG Maraton ESG Multi Asset Investment Fund, VIG MegaTrend Equity Fund, VIG Hungarian Money Market Fund, VIG MoneyMaxx Emerging Market Total Return Fund, VIG Ozon Annual Capital Protected Investment Fund, VIG Polish Bond Fund, VIG Polish Equity Fund, VIG Polish Money Market Fund, VIG Premium Umbrella Fund, VIG Russia Equity Fund, VIG SmartMoney Fund of Funds, VIG Tempo Umbrella Fund

7.6. The amount of other assets managed

636.554.809.757 HUF (31.12.2021.)

7.7. Members and positions of executive and supervisory bodies performing the operative management of the work organization of the Investment Fund Management Company

Péter Kadocsa CEO and Chairman of the Management Board, Member of the Supervisory Board of Aegon Magyarország Pénztárszolgáltató Zrt., and deputy-chairman of the Supervisory Board

Bálint Kocsis Chief Administration Officer, deputy-CEO, member of the Management Board does not conduct any major activity which is of significance for the Fund Management Company.

András Loncsák person in charge of investment management activities, trading of investment instruments and listed products, member of the Management Board does not conduct any major activity which is of significance for the Fund Management Company.

László Kovács Chief Business Development Officer, member of the Management Board, managing director for finance at Union Insurance's subsidiarys, does not conduct any major activity which is of significance for the Fund Management Company.

Zsolt Kovács Head of Sales, Member of the Management Board, deputy-CEO and member of the Management Board of Aegon Hungary Insurance Ltd

Dr Adrienn Berta Member of the Supervisory Board, deputy-CEO at Start Garancia Zrt.

Álmos Mikeşy Member of the Supervisory Board

Dr Andreas Grönbichler Member of the Supervisory Board

Gerhard Lahner Member of the Supervisory Board, Member of the Management Board, Vienna Insurance Group

Gábor Lehel Member of the Supervisory Board, Member of the Management Board, Vienna Insurance Group

Gerald Weber Member of the Supervisory Board, Head of Department, Asset Management, Vienna Insurance Group

7.8. Amount of subscribed capital of the investment fund management company, indicated the portion already paid

HUF 1,000,000,000.- which was paid in full amount (31.12.2020)

7.9. Equity capital amount of the investment fund management company

5.200.408.000 Ft (31.12.2021)

7.10. Number of employees of the investment fund management company

58 persons (31 December 2022)

7.11. Indicate the activities and tasks for which the investment fund management company may use third persons

Not applicable.

7.12. Indicate enterprises used for investment management

Not applicable.

7.13. Detailed description of the remuneration policy of the UCITS management company (such as: method of calculation of the remuneration and benefits, persons responsible for the

determination of the remuneration and benefits, if there is a remuneration committee, the names of the members of the remuneration committee)

At VIG Asset Management, the work of our colleagues creates value for our clients, which is why we have developed working conditions and an incentive system that allows employees who do excellent work to be retained in the long term and also attracts new talent. This requires a competitive remuneration system in addition to work-friendly conditions and ongoing training.

Our remuneration philosophy is based on monitoring the labor market and developing appropriate references. Part of our philosophy is to ensure that employees who meet expectations are adequately remunerated. To this end, in addition to a fixed income, we use variable pay in certain jobs, primarily in the area of asset management and sales.

At the same time, our remuneration policy only supports healthy risk-taking, thus preventing our colleagues from taking excessive risks that go beyond the mandate. The considered risks also include the sustainability risks, this way supporting the holding's vision that responsible investment practice may create value on the long run. To this end, we make risk indicators part of the interest system, among others, we also use longer-term performance data in the evaluation, and in the case of colleagues with a decisive role in risk-taking (so-called identified), we pay 50% of the variable remuneration, with a three-year deferral. Who. This allows the reward to be reduced or withdrawn in the event of excessive risk-taking after the end of the assessment period. Over the three years, the accrued portion will be invested in key investment funds managed by VIG Asset Manager, strengthening the interest in the good performance of the funds. A designated group of employees may also receive an annual variable salary (bonus) depending on performance. Employees involved in the bonus: members of the Board of Directors, fund managers and analysts, senior colleagues in the sales area, and the head of the finance and settlement area. The Asset Manager intends to reward excellent performance for the employees involved in this area on personalized terms. Based on the classification of employees working in the above areas, the maximum bonus that can be paid can reach 100 percent of annual income in the case of excellent performance. Maximum performance is achieved when all set goals are exceeded. The setting of personalized goals is the responsibility of the line manager, while its approval is the responsibility of the Chairman and Chief Executive Officer, excluding the job descriptions of the members of the Board of Directors and the identified employees. In their case, the objectives are set under the supervision of Risk Management, while their approval is the responsibility of the Chairman of the Supervisory Board. The fulfillment of the objectives will be assessed, monitored and approved in accordance with the above. In determining the amounts that can be paid out as a bonus, in addition to achieving the individual goals, the size of the bonus frame calculated and approved by the remuneration committee of the Group appears as an additional consideration.

VIG Asset Management Co. has developed and continuously maintains its remuneration policy in such a way that it complies with the sectoral legal requirements governing fund managers and other regulatory requirements, in particular the NBH's recommendation on financial institutions' remuneration policy. In addition to the above, the Asset Manager always takes into account the remuneration principles of the Group during the development of its remuneration rules.

The remuneration policy is approved by the Supervisory Board and is implemented by the Board of Directors, which is audited annually by internal audit

7.14. Summary of remuneration policy of the UICIT Fund Management Company

For our investors the work of employees of the Fund Management Company creates a value, therefore we developed such working conditions and incentive system by which employees performing excellent work can be maintained for the long run. The monitoring of the labour market and the development of adequate references provides the basis for the Remuneration philosophy of the Fund Management Company. It is also part of our philosophy that employees performing above the expectations should get an adequate remuneration; for this purpose, we apply a variable payment in addition to the fixed income, with special regard to the Asset Management and Sales Departments.

7.15. Statement by the UCITS Fund Management Company that detailed description of the Remuneration Policy set out in item 7.1.3 hereof is accessible through a website (at the same time giving the reference linking to the website) and that it is also available in printed form if requested.

Detailed abstract of the Remuneration Policy of the Fund Management Company is accessible on the website of the Fund Management Company (<https://vigam.hu/>) and can be inspected in printed form at the distribution sites.

8. Information regarding the Custodian

Citibank Europe plc Hungarian Branch Office provides custody services only as the representative of its founder (Citibank Europe Plc). The Custodian acts as custodian of the assets of the Fund and is responsible for the supervision of the Fund to the extent required by and in accordance with applicable laws, regulations and rules. The Custodian exercises its supervisory functions in accordance with applicable laws, regulations and rules and in accordance with the Custody Agreement.

The Custodian's parent company is Citibank Europe plc (hereinafter: CEP), a company incorporated under the laws of Ireland and regulated by the Central Bank of Ireland (www.centralbank.ie), address: 1 North Wall Quay, Dublin 1, place and number of registration: Companies Registration Office, no. 132781. Citibank Europe plc's Hungarian Branch Office is fully licensed to operate as a bank and conducts its primary business in Hungary from its office located at H-1133 Budapest, Váci út 80. Details of the Custodian's activities are available at <https://www.citibank.hu>.

Outsourcing and conflict of interest

Subject to the terms of the Custody Agreement, the Custodian has the right to outsource certain of its custodian tasks. The Custodian's liability is not affected by the fact of having entrusted part of the deposited Fund Assets to a third party. The use of securities settlement systems does not constitute a delegation of any custodian tasks. The Custodian, on the instructions of the Fund Manager, has entrusted the custody of part of the Fund's financial instruments to Citibank Europe plc Luxembourg Branch Office. This outsourcing was necessary in order to implement the custody of foreign securities. In addition, the legislation of certain countries may require the custody of certain financial instruments to be provided by local service providers. Investors should note that these local service providers are not necessarily subject to any prudential regulation, including minimum capital requirements, and that other local service providers may not meet these requirements. In the absence of such effective prudential regulation and supervision, investors may face additional risks. The Fund Manager promptly notifies the investors whenever any responsibilities have been delegated to a trustee. In order for the Custodian to be relieved of its liability in this regard, the Custodian must exercise due skill, care and diligence in the selection, keeping and monitoring of the third party to be entrusted to act as custodian, in order to ensure that such third party has the expertise, competence and professional integrity necessary to delegate the relevant responsibilities on a permanent basis; to the extent necessary, the Custodian must supervise the activities of the trustee and verify from time to time that the trustee continues to perform the tasks entrusted to them in a professional manner.

Conflicts of interest may arise from time to time between the Custodian and the trustees, for example where a trustee is an affiliate of a group company that receives compensation for providing another

custody service to the Fund. Where a potential conflict of interest arises in the normal course of business, the Custodian is obliged to comply with applicable laws.

Upon request, the Custodian provides up-to-date information on the trustees, their subcontractors and any potential conflicts of interest.

Reuse of assets by the Custodian

Under the custody agreement, the Custodian has agreed that neither the Custodian nor any third party acting in a custodian capacity may reuse the financial assets of the Fund. Reuse of assets held in custody with the Custodian is permitted in the following cases:

- the assets are reused on the Fund's account
- the Custodian is executing the instructions of the Fund Manager acting on behalf of the Fund
- the reuse is for the benefit of the Fund and in the interest of the investors, and
- the transaction is secured by a liquid collateral as defined in Regulation (EU) No 575/2013, provided to the UCITS in the context of a transfer of ownership, the market value of which is equal to the value of the reused assets plus a premium.

Termination of the Custody Agreement

The Custody Agreement provides that it shall remain in force until terminated by either party giving at least 60 days' written notice, although termination may be effective immediately in certain cases, such as in the event of the Custodian's insolvency. In the event of the (intended) replacement or termination of the Custodian, the Fund Manager shall appoint a successor to the Custodian with due regard to the applicable laws and regulations.

The Custodian's liability for damages

The Custodian shall be liable to the Fund or to the investors for any loss caused through its negligence or wilful default in the performance of its obligations. In the event of the Custodian's direct liability to investors, investors may not – unless otherwise provided by law – make direct claims against the Custodian but must request the Fund Manager to do so on their behalf. Investors may only bring such claims directly against the Custodian if the Fund Manager (for whatever reason) refuses to comply with their request. The Custody Agreement contains disclaimer clauses in favour of the Custodian which do not apply in the event of failure by the Custodian to comply with its duties regarding the exercise of due skill, care and diligence or as a result of negligence, wilful default or fraudulent conduct on the part of the Custodian. The Custodian shall be exempted from liability if it can demonstrate that it had no choice but to appoint a third party, including in particular cases where (a) the Fund Manager insists on holding certain investments in a particular jurisdiction – despite the Custodian's indication – or (b) the law of a third country requires certain financial instruments to be deposited with local service providers.

Other provisions of the Custody Agreement

The Custody Agreement shall be governed by the laws of Hungary, and the courts of Hungary shall have jurisdiction to settle any disputes or claims arising out of or in connection with the Custody Agreement.

8.1. Name and company form of the custodian

Citibank Europe plc's Hungarian branch

8.2. Seat of the custodian

H-1133 Budapest, Váci út 80.

8.3. Registration number of the custodian

01-17-000560

8.4. Core business of the company

NACE 64.19'08 Other monetary intermediation

8.5. Scope of activities of the custodian

NACE 64.92'08 Other credit granting

NACE 64.99'08 Other financial intermediation n.e.c.

NACE 66.12'08 Security and commodity contracts brokerage

NACE 66.19'08 6619 Other activities auxiliary to financial services

NACE 3320'08 Install industrial machinery and equipment

NACE 6201'08 Computer Programming

NACE 6202'08 Information technology consulting

NACE 6311'08 Data processing, web hosting services

TEÁOR 6820'08 Renting and operating of own or leased real estate

TEÁOR 6920'08 Accounting, bookkeeping and auditing activities; tax consultancy

NACE 70.22'08 Business and other management consultancy activities

NACE 8211'08 Complex administrative services

NACE 8220'08 Telephone information

8.6. Date of foundation of the custodian

10 November 2008

8.7. Subscribed share capital of the custodian

3.197.000,- HUF (2020.12.31.)

8.8. Equity capital of the custodian according to its last accounting statement with an independent auditor's report

10.714.505.000 USD (2020.12.31., Citibank Europe plc)

8.9. Number of the custodian's employees

1756,4 person (31.12.2017.)

9. Information regarding the auditor

9.1. Name and company form of the auditor

PricewaterhouseCoopers Könyvvizsgáló Kft.

Kőmíves Kinga

9.2. Seat of the auditor company

H-1055 Budapest, Bajcsy-Zsilinszky út 78.

9.3. Chamber membership number of the auditor company

001464

Kőmíves Kinga: 007240

9.4. Name of natural person auditor

Not applicable.

9.5. Address of natural person auditor

Not applicable.

9.6. Chamber membership number of natural person auditor

Not applicable.

10. Information regarding such consultants who are remunerated from the assets of the investment fund

10.1. Name and company form of the consultant

Not applicable.

10.2. Seat of the consultant

Not applicable.

10.3. Registration number of the consultant company, name of the court or other organization keeping the companies register

Not applicable.

10.4. Fundamental provisions of the contract entered into with the investment fund management company that can be important for the investors, except for provisions about remuneration of the consultant

Not applicable.

10.5. Other operative activities of the consultant

Not applicable.

11. Information regarding the distributor (for each distributor)

11.1. Name and company form of the distributor

VIG Asset Management Hungary Closed Company Limited by Shares

further distributors:

Budapest Bank Zrt

CIB Bank Zrt.

Concorde Értékpapír Zrt.

Conseq Investment Management, a. s.

Equilor Befektetési Zrt.

Erste Befektetési Zrt

OTP Bank Nyrt.

Raiffeisen Bank Zrt.

SPB Befektetési Zrt.

MTB Magyar Takarékszövetkezeti Bank Zrt.

UniCredit Bank Hungary Zrt.

11.2. Seat of the distributor

*Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares
Seat: 1091 Budapest, Üllői út 1.*

Name of distributor: Budapest Bank Zrt.
Seat: 1138 Budapest, Váci út 193.

Name of distributor: CIB Bank Zrt.
Seat: 1024 Budapest, Petrezselyem utca 2-8.

Name of distributor: Concorde Értékpapír Zrt.
Seat: 1123 Budapest, Alkotás utca 50.

Name of distributor: Conseq Investment Management, a. s.
Seat: Burzovní palác, Rybná 682/14 110 00 Praha 1, Czech Republic

Name of distributor: Equilor Befektetési Zrt.
Seat: 1037 Budapest, Montevideo utca 2/c.

Name of distributor: ERSTE Befektetési Zrt.
Seat: 1138 Budapest, Népfürdő u. 24-26.

Name of distributor: OTP Bank Nyrt.
Seat: 1051 Budapest, Nádor u. 16.

Name of distributor: Raiffeisen Bank Zrt.
Seat: 1133 Budapest, Váci út 116-118.

Name of distributor: SPB Befektetési Zrt.
Seat: 1051 Budapest, Vörösmarty tér 7-8.

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Seat: 1122 Budapest, Pethényi köz 10.

Name of distributor: UniCredit Bank Hungary Zrt.
Seat: 1054 Budapest, Szabadság tér 5-6.

11.3. Registration number of the distributor

*Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares
Registration number: 01-10-044261*

Name of distributor: Budapest Bank Zrt.
Registration number 01-10-041037

Name of distributor: CIB Bank Zrt.
Registration number 01-10-041004

Name of distributor: Concorde Értékpapír Zrt.
Registration number: 01-10-043521

Name of distributor: Conseq Investment Management, a. s.
Registration number: B 7153

Name of distributor: Equilor Befektetési Zrt.
Registration number: 01-10-041431

Name of distributor: ERSTE Befektetési Zrt.
Registration number: 01-10-041373

Name of distributor: OTP Bank Nyrt.
Registration number: 01-10-045585

Name of distributor: Raiffeisen Bank Zrt.
Registration number: 01-10-04104

Name of distributor: SPB Befektetési Zrt.
Registration number: 01-10-044420

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Registration number: 01-10-041206

Name of distributor: UniCredit Bank Hungary Zrt.
Registration number: 01-10-041348

11.4. Scope of activities of the distributor

Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares

Scope of activities

- NACE 66.30'08 Fund management activities – core activity
- NACE 64.99'08 Other financial intermediation n.e.c.
- NACE 66.12'08 Security and commodity contracts brokerage
- NACE 66.19'08 6619 Other activities auxiliary to financial services

Name of distributor: Budapest Bank Zrt.
Scope of activities: NACE 6419 Other monetary intermediation

Name of distributor: CIB Bank Zrt.
Scope of activities: NACE 6419 Other monetary intermediation

Name of distributor: Concorde Securities Zrt.
Scope of activities: 6612 Security and commodity contracts brokerage

Name of distributor: Conseq Investment Management, a. s.
Scope of activities: Securities, Commodity Contracts, and Other Financial Investments and Related Activities

Name of distributor: Equilor Investment Zrt.
Scope of activities: 6612 Security and commodity contracts brokerage

Name of distributor: ERSTE Investment Zrt.
Scope of activities: 6612 Security and commodity contracts brokerage

Name of distributor: OTP Bank Nyrt.
Scope of activities: NACE 64.19'08 Other monetary intermediation

Name of distributor: Raiffeisen Bank Zrt.
Scope of activities: NACE 64.19'08 Other monetary intermediation

Name of distributor: SPB Investment Zrt.
Scope of activities: 6612 Security and commodity contracts brokerage

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Scope of activities: NACE 64.19 Other monetary intermediation

Name of distributor: Unicredit Bank Hungary Zrt.
Scope of activities: NACE 64.19 Other monetary intermediation

11.5. Date of foundation of the distributor

*Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares
Date of foundation: 29 November 1999*

Name of distributor: Budapest Bank Zrt.
Date of foundation: 16 March 1987

Name of distributor: CIB Bank Zrt.
Date of foundation: 9 November 1979

Name of distributor: Concorde Securities Zrt.
Date of foundation: 12 December 1997

Name of distributor: Conseq Investment Management, a. s.
Date of foundation: 1994.

Name of distributor: Equilor Investment Zrt.
Date of foundation: 7 May 1990

Name of distributor: ERSTE Investment Zrt.
Date of foundation: 24 May 1990

Name of distributor: OTP Bank Nyrt.

Date of foundation: 1 March 1949

Name of distributor: Raiffeisen Bank Zrt.
Date of foundation: 10 December 1986

Name of distributor: SPB Investment Zrt.
Date of foundation: 11 August 2000

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Date of foundation: 18 April 1989

Name of distributor: Unicredit Bank Hungary Zrt.
Date of foundation: 23 January 1990

11.6. Subscribed capital of the distributor:

Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares
Subscribed capital: HUF 1,000,000,000.-

Name of distributor: Budapest Bank Zrt.
Subscribed capital: HUF 19.395.945.000

Name of distributor: CIB Bank Zrt.
Subscribed capital: HUF 145,000,000,002

Name of distributor: Concorde Securities Zrt.
Subscribed capital: HUF 100,000,000

Name of distributor: Conseq Investment Management, a. s.
Subscribed capital: CZK 20.000.000

Name of distributor: Equilor Investment Zrt.
Subscribed capital: HUF 1,000,000,000

Name of distributor: ERSTE Investment Zrt.
Subscribed capital: HUF 2,000,000,000

Name of distributor: OTP Bank Nyrt.
Subscribed capital: HUF 28,000,000,000

Name of distributor: Raiffeisen Bank Zrt.
Subscribed capital: HUF 50,090,000,000

Name of distributor: SPB Investment Zrt.
Subscribed capital: HUF 300,000,000

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Subscribed capital: HUF 2,564,000,000

Name of distributor: Unicredit Bank Hungary Zrt.
Subscribed capital: HUF 24,118,000,000

11.7. Equity capital of the distributor according to its last accounting statement with an independent auditor's report

Name of distributor: VIG Asset Management Hungary Closed Company Limited by Shares

Equity capital: 5.200.408.496 Ft (31.12.2021.)

Name of distributor: Budapest Bank Zrt.
Equity capital: 4.866.882.000 Ft (2020.12.31.)

Name of distributor: CIB Bank Zrt.
Equity capital: 249.385.000.000 HUF (2020.12.31.)

Name of distributor: Concorde Securities Zrt.
Equity capital: 6.366.895.000 HUF (2021.12.31.)

Name of distributor: Conseq Investment Management, a. s.
Equity capital: CZK 1.003.937.000

Name of distributor: Equilor Investment Zrt.
Equity capital: 1.932.951.000 HUF (2019.12.31.)

Name of distributor: ERSTE Investment Zrt.
Equity capital: 23 588 584 000 HUF (2021.12.31.)

Name of distributor: OTP Bank Nyrt.
Equity capital: 3.036.766.000.000 Ft (2021.12.31.)

Name of distributor: Raiffeisen Bank Zrt.
Equity capital: 279.682.000.000 HUF (2021.12.31.)

Name of distributor: SPB Investment Zrt.
Equity capital: 580.635.000 HUF (2021.12.31.)

Name of distributor: MTB Magyar Takarékszövetkezeti Bank Zrt.
Equity capital: 34.520.620.909 HUF (2021.12.31.)

Name of distributor: Unicredit Bank Hungary Zrt.
Equity capital: 395.360.000.000 HUF (2021.12.31.)

11.8. Possibility to forward the data of investors and/or their representatives recorded by the distributor to the investment fund management company

In addition to the Fund Management Company, further distributors participate in the distribution of the Investment Units. In such a case, the Distributor does not forward any data regarding investors or their representatives.

12. Information regarding the real estate appraiser

12.1. Name of real estate appraiser

Not applicable.

12.2. Seat of the real estate appraiser

Not applicable.

12.3. Company registration number, other registration number of the real estate appraiser

Not applicable.

12.4. Scope of activities of the real estate appraiser

Not applicable.

12.5. Date of foundation of the real estate appraiser

Not applicable.

12.6. Subscribed capital of the real estate appraiser

Not applicable.

12.7. Equity capital of the real estate appraiser

Not applicable.

12.8. Number of employees of the real estate appraiser

Not applicable.

13. Other information regarding the relevant subject

Not applicable.