
GENERAL INFORMATION REGARDING INVESTMENTS

(including best execution policy)

provided by

Kathrein Privatbank Aktiengesellschaft
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entered in the company register: FN 144838y, Company Register Court Commercial Court Vienna,
Data Processing No. 0041688
In the following referred to as "Kathrein"

We are pleased that you are interested in our services in the investment space.

This document "General Information Regarding Investments" has been amended to reflect the updates to the Austrian Securities Supervision Act (Wertpapieraufsichtsgesetz, WAG) to account for the regulatory requirements of the Market in Financial Instruments Directive (MiFID II).

By adopting MiFID II and incorporating it into the WAG 2018, the European and Austrian legislature seek to achieve the following goals:

- create a level playing field for financial services providers
- improve the level of protection for investors through increased transparency and even more comprehensive information

This document shall provide customers with information that might be of importance to them in connection with investment transactions with Kathrein. It does not however take the place of any contractual agreements that might be required.

I. Kathrein Privatbank Aktiengesellschaft

1.) License

Kathrein has been granted a license by the Financial Market Authority (FMA), Otto-Wagner-Platz 5, 1090 Vienna to perform banking services, which authorizes Kathrein to engage in investment and securities transactions with its customers.

2.) Communication with Kathrein

Kathrein communicates with its customers in German. In addition to one-on-one conversations, clients have the option to contact Kathrein by phone, in writing, by fax or via e-mail. Legally relevant correspondence between Kathrein and its customers will however be in writing and in the German language, unless otherwise agreed upon.

All electronic forms of communication (by phone, e-mail etc.) will be recorded, as required by law. This applies to incoming and outgoing messages alike. Therefore, in order to perform transactions electronically, Kathrein and the customer must enter into a services agreement. Kathrein has the discretion to determine which forms of electronic communication to offer.

The customer may request the records for a period of 5 years.

3.) Information on Customer Classification

Banks are required to classify their customers as retail clients, professional clients or eligible counterparties.

As a general rule, clients are classified as retail clients in accordance with the Wertpapieraufsichtsgesetz (hereinafter "WAG"). In case of different classification (e.g. professional clients or eligible counterparties), separate documentation will be provided. Retail clients are awarded the highest degree of protection under WAG.

Professional clients and eligible counterparties may request status as retail clients at any time (or as professional clients respectively) and thus be granted more protection. Corporations that qualify as professional clients may also apply for classification as eligible counterparty. Eligible counterparties are afforded the lowest level of protection under the WAG.

In addition, customers who fulfill the regulatory requirements may apply for professional client status, but those sophisticated clients are offered less protection than "retail clients."

Suitability of the financial products for the retail client is part of the consultation services during the initial investment consultation and is offered at least once a year afterward.

II. Services offered by Kathrein in the Investment Business

1.) Services offered

For investment and securities transactions Kathrein offers the following services:

a) Client consultation

Analysis of customer needs (such as expertise and experiences, financial situation and investment goals), and recommendation of suitable products of Kathrein and partners (including companies of the Raiffeisen group).

Kathrein has in-depth knowledge of these products, e.g. the latest management approach for funds, and can provide its customers with the relevant detailed information.

In addition to detailed advice regarding the various Kathrein-proprietary investment products, Kathrein is able to provide its customers with information on third-party products.

The investment strategy proposed by Kathrein during client consultation is tailored to individual customer needs and takes their investment objectives, financial situation and risk appetite into account. The investment strategy is customized to the clients' expertise and experiences.

b) Purchase / Sale of securities

Kathrein offers its customers the opportunity to purchase and sell investment products. Depending on the type of product, Kathrein itself may act as purchaser or seller or close the relevant transaction on behalf of the customer with a third party. Frequently, other partners act as intermediary and receive the customer order.

c) Custody and management of securities and maintenance of settlement account

Kathrein holds customer securities in safe custody and regularly uses the services of third-party custodians.

d) Asset management

Kathrein accepts customers' assets for management in accordance with customer instructions or at its own discretion, always taking into account the investment strategy in accordance with the financial situation, expertise and experiences as well as the investment objectives of its customers. Kathrein offers clients tailored investment management options. Implementation of the investment approach can be through fund of funds, mutual funds, individual instruments and special funds.

The client instructs and gives Kathrein a mandate to invest the amount placed under management in line with the agreed upon investment approach and without obtaining instructions from the client, i.e. at the sole discretion of Kathrein. Kathrein may retain the services of another member of the Raiffeisen Banking Group Austria to fulfill this agreement. The client agrees that Kathrein may invest in financial instruments that are issued or offered by institutions that are closely affiliated with Raiffeisenbank.

With all asset management mandates, Kathrein employs the following valuation criteria for financial instruments held in client portfolios:

- Investment funds are generally valued at the share price published by the respective fund company;
- Prices of listed securities are generally determined by the prices of those securities on the main stock market.
- If no market price is available for the financial instruments, Kathrein will seek to determine the fair value of the instruments using generally accepted valuation measures.
- Financial instrument valuation within the customer portfolios will generally happen on bank business days when valuation prices are available, but at the latest at the relevant reporting date.
- Kathrein is entitled to combine orders from various customers and forward them for execution as an aggregate order. If this aggregate order is executed at different prices, the bank will distribute the orders among customer accounts by averaging.

e) Purchase of other financial instruments

Kathrein offers its customers the option to purchase or sell other financial instruments, e.g. hedging instruments, currency futures and swaps. Depending on the type of product, Kathrein itself may act as purchaser or seller or close the relevant transaction on behalf of the customer with a third party. Frequently, other partners act as intermediary and receive the customer order.

2.) Investment information (risk information)

A general description of the securities that can be part of the services offered by Kathrein is contained in the basic information regarding securities and other investments, including risk information, which is provided to the customer together with the securities account agreement (opening documents) and this "General Information Regarding Investments." Upon request, the customer will receive additional risk information regarding the respective securities products, provided they are not fully covered in the existing risk information. Should a customer wish to receive information from Kathrein regarding a financial instrument described in a sales prospectus, the customer may request said prospectus from his/her customer relationship manager.

3.) Customer information

Customers of Kathrein will be kept informed about services provided to them by Kathrein in compliance with the relevant legal provisions regarding their investments.

a) Settlements

Without limitation, settlement notes for securities transactions are provided immediately, at the latest within one business day after complete settlement of the customer order, to the customer by the mutually agreed upon means.

b) Securities account statement

Unless otherwise agreed upon with the customer, statements listing the securities held on deposit for the customer are provided quarterly.

c) Special case: leveraged products and contingent liabilities

For leveraged products and contingent liabilities contained in the securities accounts, in the event of loss in value of the relevant instrument greater than 10% or a multiple thereof within one business day, the customer will be notified by Raiffeisen about this loss.

4.) Non-independent advisory model and relationship to product providers

The Raiffeisen Banking Group, of which Kathrein is a member, has a number of product providers whose products receive preference due to the close affiliation with the group. This close association of Kathrein means that its investment advice is non-independent. Those products distributed mainly by product providers that are closely linked with Kathrein, are customized and carefully selected to meet the goals and needs of the customers as well as possible and allow for optimal consulting and investment.

III. Executing Customer Orders

Kathrein has established a framework of principles for the execution of customer orders in order to achieve optimal results for its customers. Those principles are referred to as Best Execution Policy. Unless otherwise directed by the customer, Kathrein fulfills customer orders following this best execution policy. . Kathrein however cannot guarantee that each and every client order will achieve optimal results.

Set forth below are the most essential parts of the best execution policy. The best execution policy also names eligible venues of execution (e.g. stock exchanges) for a specific category of customer orders. The concrete venue is then determined based on the order submitted to Kathrein

1.) Scope

The best execution policy shall be applied to orders for the purchase and sale of financial instruments.

The best execution policy provides for delegating orders to other intermediaries for execution (simple agency) and execution of the order by Kathrein (dealing in its own name).

The best execution policy does not apply to purchase agreements between Kathrein and the customer (so called "fixed price transactions"). A purchase agreement results when Kathrein and the customer agree on a fixed price for the underlying transaction, such as a fixed price securities transaction (in particular bonds), interest rate and currency derivatives and other over-the-counter financial futures.

In addition, the best execution policy does not apply to the issue and redemption of shares in investment funds through the relevant depository bank. Those are effected by the relevant depository bank of the investment fund or intermediaries (e.g. banks, fund trading platforms).

2.) Weighting of the execution aspects:

The most favorable result for retail clients shall be determined by the total fee income the customer obtains for a sale or pays for a purchase. It comprises the price for the financial instrument and the cost associated with order execution.

The price depends largely on the price quality of the venue of execution. Price quality can first and foremost be determined by long-term liquidity.

Costs comprise all expenses incurred by the customer that are directly related to order execution. Due to similar charges at the various venues of execution, Kathrein uses liquidity as the main factor for determining the place of execution.

Additional aspects for execution are taken into account whenever there is a large-size order or the order requires execution in an over-the-counter market. In those instances, the probability of execution and settlement and even the promptness/speed of execution become more important.

Kathrein weights the aspects of execution equally for retail clients and professional customers.

3.) Implementation

Kathrein has its own direct connection to venues of execution (MTF or multilateral trading facility). In addition, Kathrein delegates orders for execution to an intermediary (e.g. a broker), including but not limited to Raiffeisen International AG and other members of the Raiffeisen Banking Group, while adhering to its best execution policy. For more information on possible venues of execution, please refer to item 4.

Orders can also be executed outside of regulated stock exchanges, if execution or settlement would otherwise be unlikely (e.g. over-the-counter execution of exchange-traded certificates due to a lack of liquidity on the stock exchange).

Under certain conditions, Kathrein aggregates several customer orders for the purchase and sale of subscription rights, provided this is not unfavorable for the customer. Customer orders are not combined with orders of Kathrein for its own account. In doing so, Kathrein seeks to avoid putting the respective customers at a disadvantage. It should be noted though that aggregating can also prove unfavorable for some orders.

Orders to purchase are primarily executed at the largest venue of execution in the issuing country, since this venue regularly allows for execution in line with the weighting of the aspects of execution whilst taking into account the liquidity of the markets.

For orders to sell, the stock exchange where the last initial or additional purchase of the security was executed is suggested to the customer.

4.) Venues of execution

a) Regular venues of execution:

(i) Equities, funds traded solely on stock exchanges, derivative instruments, other types of equity securities, certificates and warrants

Based on the foregoing importance of criteria, orders are primarily executed at the main trading venue, on another regulated market or on a multilateral trading facility, since given existing stock exchange memberships and market liquidity, execution in line with the importance of the execution criteria can be achieved on a regular basis. The main trading venue is the stock exchange specified by the issuer or which achieves high trading volumes. Orders are executed regularly on the leading stock exchanges of the relevant countries (e.g. Vienna, Frankfurt, Stuttgart, London, New York).

(ii) Bonds

For bonds, total price along with the likelihood of execution is given more weight. Orders are executed through agency trading of Raiffeisen Bank International AG either on a stock exchange (main trading venue) or over the counter, or execution is provided by a third-party.

(iii) Existing positions in securities (i) and (ii)

Sales of existing positions in securities are executed on the relevant stock exchange, provided they are not part of fixed price transactions. Securities that are delivered to an account are sold on the securities exchange specified at delivery or at the main trading venue.

(iv) Issue and redemption of shares

Share certificates are issued and redeemed by the relevant custodian bank of the investment fund or via fund trading platforms.

b) Special venues for execution

Customer orders can be executed outside of regulated trading venues if execution and settlement would otherwise be unlikely.

5.) Customer's instructions

The customer may give Kathrein order-specific or general instructions as to which venue of execution should be used for the order or how aspects of execution should be weighted. This type of instructions has priority over the provisions of the best execution policy.

Kathrein states expressly that customer instructions may prevent it from achieving optimal results in line with the best execution policy referred to herein. This also applies to specific order supplements. The customer has the option to choose a venue of execution for orders that can fulfill his/her specific order supplements.

IV. Conflicts of Interest

1.) Fundamentals for addressing conflicts of interest

Kathrein has established a set of guidelines for addressing conflicts of interest. These guidelines are in place to prevent that a conflict of interest arises between

- a customer and Kathrein,
 - a customer or any employee of Kathrein,
 - a customer and a company under the control of Kathrein, or
 - between customers of Kathrein
- and hurts the interests of a customer.

The fundamental principles of this guideline are as follows:

- The highest principle is to prevent conflicts of interest. Kathrein has appointed a compliance officer who, in situations where conflicts of interest are inevitable, ensures that investment transactions are executed in compliance with the relevant legal requirements and who reports to management on a regular basis.
- For consulting services the customer's interests are the sole concern.
- Any trading by Kathrein for its own account is separate from transactions for the account of customers.
- In case of conflicts of interest due to shortages (i.e. there are more customer orders than can be executed), clearly stated principles of allotment established before any allotment takes place (e.g. principle of priority or allocation pro rata) apply in order to avoid subjective preferences in favor of individual customers. Other conflicts of interest are communicated to the customers on a case by case basis depending on Kathrein's specific involvement.
- Pricing of proprietary products is based on prevailing market conditions.
- Kathrein has established Chinese walls appropriate for its size and organizational structure to prevent transfer of information between persons whose actions could result in a conflict of interest. If in particular cases exchange of information between defined areas of confidentiality that could result in a conflict of interest is unavoidable, the compliance officer will be notified and will take the appropriate measures.
- The organizational structure of Kathrein is designed to prevent any undue influence regarding the way investment services are provided.
- Kathrein employees undergo regular training on how to address conflicts of interest.
- Investments that could constitute potential conflicts of interest under the Stock Exchange Act are disclosed on Kathrein's website.
- In the event a conflict of interest is unavoidable despite the above-mentioned measures, Kathrein will inform the customer in general or specifically before placing an order so that the customer can make a decision based on his/her knowledge of the conflict of interest.

2.) Detailed information

Upon request, the customer will receive further details about the guidelines for addressing conflicts of interest.

V. Financial Compensation - Inducements

1.) Information on compensation for the sale of products

Kathrein receives compensation from some of its partners whose products it sells for providing non-independent investment advice as well as for ongoing customer service, continuing education events and processing of information.

The receipt of compensation (inducements) is subject to strict criteria. Compensation received is utilized for measures that enhance quality for customers. Principally, Kathrein is vigilant to ensure that compensation does not impair its ability to optimally fulfil its obligations to the customer.

For discretionary asset management services (see item II 1d), payments (inducements) are passed on to the customer, provided it is not minor non-monetary benefits.

Kathrein promotes advisory services tailored to customer requirements emphasizing diversification of risk. The advice offered is tailored to the needs of the customer and not dependent on the level of compensation for the products. The amount of commission depends on the type of product and the issuer or intermediate.

Kathrein receives such commissions regularly from its partners as follows:

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|---------------------------------|--|
| • initial sales charge: | compensation up to the full amount of the initial sales charge |
| • management fee (funds): | up to the full amount of the annual fee based on the value of the shares in the customer account |
| • regular portfolio commission: | annual compensation as a percentage of the value of the shares in the customer account |

The above-stated percentages can sometimes be exceeded and supplemented by one-off payments.

For issues of securities Kathrein may receive a sales commission from the issuer or its distributor. Normally, Kathrein receives higher compensation for products of the Raiffeisen Banking Group Austria than from the sale of third-party products.

2.) Basic information on compensation resulting from customer referrals

If Kathrein refers customer business to another financial institution or other third-party provider, Kathrein receives compensation from said institution or other third-party provider for the referral, and in turn Kathrein compensates a referring bank or third-party. In both scenarios the amount of compensation represents a portion of the fees (payments) or a portion of the margins on the business referral.

3.) Detailed information

Upon request, Kathrein will provide further details about the compensation or commission agreements stated under 1 and 2 above. As of January 3, 2018, the retained benefits will be disclosed to customers during the course of a consultation before receiving their orders.

VI. Securities Safekeeping for Customers

1.) Third-party custodian services

Securities placed in safekeeping with Kathrein on behalf of its customers – to ensure the highest level of protection for those securities – are transferred to institutions specializing in the safekeeping of securities (referred to as "third-party custodian"). Kathrein shall be liable to the customer for any damages arising from unlawful, culpable actions or omissions of third-party custodians. In the event Kathrein acts as custodian of securities within the scope of a customer's company, Kathrein's liability is limited to the careful selection of a third-party custodian. If despite careful selection a third-party custodian should become insolvent, Kathrein may request surrender of the securities placed into safekeeping with the third-party custodian.

2.) Collective safekeeping

Securities placed into safekeeping with Kathrein are kept with the same type of securities of other customers (referred to as "collective safekeeping"). Since each customer can request surrender of his/her portion of the collectively kept securities (even in the event of insolvency of Kathrein or the third-party custodian), collective safekeeping does not pose any specific risks to the customer.

3.) Safekeeping abroad

It may become necessary to place securities in safekeeping with third-party custodians abroad, including those outside of the European Economic Area. Consequently, these securities become subject to the laws of the relevant jurisdiction in which they are kept. Those laws can differ significantly from provisions applicable in Austria and do not necessarily grant the same level of protection.

4.) Protection of customer securities

As an Austrian bank, Kathrein is subject without limitation to the Austrian provisions governing Deposit Guarantee and Investor Compensation (Einlagensicherungs- und Anlegerentschädigungsgesetz, ESAEG).

Kathrein is a member of the deposit guarantee system of the Banken & Bankiers Gesellschaft m.b.H.

The homepage of the Einlagensicherung der Banken & Bankiers Gesellschaft m.b.H. (Association of Banks and Bankers) (www.einlagensicherung.at) contains

the relevant information

- for depositors, in particular information about the provisions for the procedure of refunding deposits and the terms of deposit guarantee and
- investor compensation.

Furthermore, please refer to the regulations which we can furnish upon request.

a) Deposit guarantee

Deposits (i.e. deposits and balances in checking or savings accounts, such as salary, savings and pension accounts, securities clearing accounts, other checking accounts, time deposits or fixed-term savings accounts (Kapitalsparbücher) of natural persons and legal entities are guaranteed up to a limit of EUR 100,000.00 per depositor, regardless of whether it is a personal or professional deposit. When calculating covered deposits, refundable deposits shall not be taken into account if there are liabilities of the depositor to Kathrein that can be offset under legal or contractual provisions and that were due before or at the latest at the time of the event that would trigger the compensation. The maximum amount applies per credit institution.

b.) Investor compensation

According to Austrian law, the bank maintaining the securities account must return the securities to the investors. Securities only placed in safekeeping with the bank do not become part of bankruptcy assets. They are either given to the customer or transferred to the securities account at another bank.

Claims from investor compensation are guaranteed at a maximum of EUR 20,000 for natural persons and legal entities alike. Claims from legal entities are limited at 90% of the claim from securities transactions per investor.

c) Claims that are covered by investor compensation

In principal, all claims arising against the credit institution are covered on the basis of:

- the custody and management of securities for others (depository services),
- the credit institution's trading in money market instruments, financial futures, interest rate futures, forward rate agreements, interest rate and currency swaps as well as equity swaps, securities and derivatives therefrom,
- the credit institution's participation in third-party issues (loto issues),
- the acceptance and investment of severance pay contributions and self-employment pension contributions (company pension funds)

d) excluded from investor compensation

The exclusions from investor compensation provided for in section 47 ESAEG are set forth below in simplified terms.

Coverage does not extend including without limitation to claims on the basis of securities transactions

- of credit and financial institutions, insurance undertakings and investment firms,
- of pension and retirement funds and undertakings for collective investments in securities
- of governmental institutions, including but not limited to nations, regional and local administrative bodies as well as central administrations,
- of own funds, debentures and liabilities from one's own promissory notes and those of credit institutions,
- of persons affiliated with the credit institution, such as managing directors, members of the management board or the supervisory board, personally liable partners (for partnerships under commercial law), auditors of the bank, and individuals holding at least 5% of the bank's capital, even if those individuals perform roles for affiliated companies of the bank (with the exception of insignificant investments),
- of relatives of the persons associated with the credit institution, as well as third-parties, if the close relative or third-party acts on account of the person associated with the credit institution,
- of other corporations that are affiliated with the credit institution (section 244 Austrian Commercial Code, Unternehmensgesetzbuch, UGB),
- in connection with transactions on the basis of which persons were convicted of money laundering during criminal proceedings,
- for which the beneficiary received interest rates or other financial benefits on an individual basis that lead to a deterioration of the financial position of the credit institution or the investment firm in accordance with section 12 par. 1 WAG 2007,
- of companies that meet the requirements for large investment corporations within the meaning of section 221 par. 3 UGB (Austrian Commercial Code).

e) Distinction deposit guarantee – investor compensation

There is no right to double compensation for one and the same claim that qualifies for reimbursement under the provisions of the deposit guarantee and under the investor compensation scheme. Claims from account balances covered by deposit guarantee shall be reimbursed out of the deposit guarantee fund.

5.) Liens and right to retain

Securities placed in safekeeping with Kathrein are subject to a lien and right to retain as collateral for any and all claims Kathrein has against a customer. Third-party custodians may enforce a lien on the securities in safekeeping with regards to any claims (including but not limited to custodian fees) arising against the third-party custodian from safekeeping of the securities.

VII. Terms and Costs

1.) Custody agreement

Together with this general information on investments and before opening a securities account, the customer is provided with a copy of an account and custody agreement (opening documents) he/she must sign with Kathrein if interested in securities transactions.

2.) Prices and costs

The standard fees for securities related services rendered by Kathrein are published in the price schedule (terms and conditions sheet) which is part of the custody agreement. This schedule is available at the offices of Kathrein, and each customer receives a copy upon entering into the custody agreement (opening of general account and securities account). In addition to the fees paid to Kathrein and listed in the price catalog, securities transactions involve cash expenses which Kathrein has to pay to third-parties in connection with the execution of customer orders (including but not limited to charges, purchase price or market price of securities acquired and broker fees). Those cash expenses shall also be borne by the customer as well.

Any associated costs will be disclosed to the customer in time before entering into a transaction, and post transaction once per fiscal year. Costs will be provided to the customer in total. The percentage of compensation as part of the total cost will be reported separately.

All costs will be expressed as a percentage and in numbers. For percent costs of e.g. 1% and an investment of EUR 1,000, fees of EUR 10 must be reported.

3.) Foreign exchange transactions

In the event an order placed with Kathrein requires payments in foreign currency or to convert payments in foreign currency to euros, Kathrein will convert the currency at the prevailing market rate which Kathrein will charge to the customer at the time of settlement. The current rate of exchange will be posted daily on the premises of Kathrein and can also be requested by phone.

Any additional fees due Kathrein in connection with the currency conversion are set forth in the price schedule. The amount of foreign currency fees as a percentage of total cost will be disclosed in time before entering into a transaction, and post transaction once per fiscal year.

4.) Additional taxes and expenses

It should be noted that in addition to the aforementioned fees and cash expenses, additional costs and taxes (e.g. domestic and international capital gains taxes) might arise for the customer that are not necessarily paid or charged through Kathrein. The customer is responsible for any taxes, including but not limited to those due in the country of residency.

5.) Customer payments

Amounts payable to Kathrein for securities transactions shall be charged to the customer account, unless otherwise agreed upon.

VIII. Complaints

Kathrein strives to provide its customers with high-quality banking services and to address their concerns and requests, and meet their demands as best as possible.

In the event a customer has reason for complaint, Kathrein will review the complaint immediately. Customers should either contact their relationship manager, or if no satisfactory solution can be reached, the management of Kathrein or the Office for Complaints (mailto: compliance@kathrein.at) of Kathrein. In the event the complaint refers to one particular securities transaction, the customer will be asked to provide all known data regarding the transaction in order to allow for timely investigation and solution of the issue.

IX. Transitional Provisions

This general information regarding investments takes effect immediately.

Exception: Section II, par. 3, subpar. b) and c), as well as section VII, par. 2 and 3 will go into effect on 01/03/2018.