

# Information on Benefits/Inducements

## Introduction

As DJE Investment S.A. (“Company”), we act in the exclusive interest of investors and the integrity of the market when carrying out our activities.

This policy follows the requirements of Article 32 of the CSSF Regulation 10-04 and ensures that all inducements received or granted by the Company are disclosed and justified in compliance with these standards.

In the context of managing investment assets, we neither accept inducements (monetary or non-monetary) from third parties nor grant such inducements to third parties unless permitted under the applicable legal provisions.

Inducements refer to financial and non-financial benefits received by the Company from third parties or paid to third parties due to or in connection with its role as a management company or Alternative Investment Fund Manager (AIFM). This includes commission payments and supportive non-monetary benefits.

For services related to the management of investment funds, the Company may pay or receive distribution commissions, trailing commissions, brokerage fees, and non-monetary benefits.

## Distribution Commission

Distribution commission refers to a one-time fee received or paid by the Company per transaction. This can include commissions in the form of subscription fees, performance-related monetary benefits such as volume-based payments, bonuses, or discounts on the subscription price. The distribution commission is aimed at initiating business through the marketing of the fund to acquire investors, contributing to sustainable and efficient fund management.

The portions of distribution commissions received by the Company from the acquisition of assets for the funds it manages are generally passed on to the respective investment funds.

The Company may pass on part or all of its management fees, as well as any subscription fees, to its distribution partners in the form of commission payments for their intermediary activities. These collaborations are governed by contractual agreements that stipulate the provision of distribution commissions and/or subscription fees, either in full or partially, to the third party.

The maximum management fee and any applicable subscription fees can be found in the prospectus for the respective fund.

## Trailing Commissions (Maintenance Commissions)

The Company may pay trailing commissions to its distribution partners and service providers. Trailing commissions foster long-term partnerships with distribution partners and are inducements designed to establish or maintain efficient and high-quality infrastructures for the distribution of fund units.

The Company may pass on a portion of its management fee to its distribution partners and service providers as trailing commissions for maintaining customer portfolios. Such collaborations are typically governed by agreements stipulating that the Company pays portfolio-based trailing commissions to third parties for mediating fund units.

These portfolio-based commissions are paid by the Company from its own management fees, i.e., its own resources. The amount of payments depends on the size and holding duration of the portfolios managed by the distribution partners.

Trailing commissions received by the Company from the acquisition of target fund units for its managed funds are generally passed on to the respective investment funds.

The maximum management fee and any applicable subscription fees can be found in the prospectus for the respective fund.

## Supportive Non-Monetary Benefits

These typically include professional training, consulting support services, financial analyses, provision of brochures, forms, and contract documents, as well as IT hardware and software. These benefits are either received by the Company or provided by the Company to third parties and aim to maintain or improve the quality of services. Supportive non-monetary benefits can vary significantly and are not easily quantifiable.

## Gifts / Monetary Benefits

The Company may receive monetary benefits (e.g., broker research, financial analyses, market and price information systems) in connection with transactions for the investment funds, which are used in the interest of investors for investment decisions.

These are non-specific, voluntary non-monetary benefits of various kinds that are provided to or by the Company within a reasonable, customary scope to contribute to long-term client satisfaction.

Gifts and monetary benefits may only be accepted or granted if they remain within an internally defined limit. These inducements must not significantly influence professional decisions or lead to biased decision-making.

To avoid conflicts of interest, employees of the Company are required to report financial or non-monetary benefits from third parties to the Compliance Officer.

The acceptance of cash or cash-like benefits (e.g., checks, gift cards, lottery tickets with monetary or material prizes, etc.) by employees of the Company is strictly prohibited.

Acceptance of non-monetary benefits, such as trips, leisure events, dining invitations, material gifts, etc., is permitted only if it exclusively serves the business interests of the Company or the investors of the managed investment funds and appears suitable to improve the relevant performance. Non-monetary benefits below a de minimis threshold (e.g., business meals within reasonable limits, small promotional items like pens, USB sticks, notepads) do not require notification to the Compliance Officer.

The provisions of this section also apply to financial or non-monetary benefits granted by the Company to third parties.

### **Monitoring Framework**

The Company has established a system for monitoring received and granted inducements. Reported inducements are reviewed by the Compliance Department to ensure compliance with regulatory requirements. Employees are required to promptly report any benefits exceeding EUR 50 to the Compliance Officer.

### **Special Notice**

With this information, the Company discloses, as thoroughly and accurately as possible in a standardized format, all inducements received or granted in connection with the management of investment funds and related ancillary services. The Company assumes that investors can form a complete picture of the inducements received or granted by consulting this information and, if necessary, the fund's prospectus.

All inducements related to the management of investment funds are intended to improve the quality of services provided. This includes creating efficient infrastructures, facilitating professional training, and enhancing consulting support. Under no circumstances may such inducements compromise the Company's independence or its obligation to act in the best interests of investors.

The Company is committed to transparently disclosing the nature, scope, and method of calculation for inducements wherever possible. Investors have the right to request detailed information about the nature and scope of received or granted inducements if not already disclosed through other means. The Company commits to responding to such inquiries promptly and transparently.

Should you have further questions, the management company will be pleased to provide additional information.