

The Fund rules were adopted by the Board of Directors of OP Fund Management Company Ltd on 28 November 2023 and have been effective since 1 January 2024.

## **OP-PUBLIC SERVICES REAL ESTATE FUND RULES**

### **§1 Name of the Fund**

The name of the mutual fund is OP-Public Services Real Estate Fund (Fund), in Finnish OP-Palvelukiinteistöt -erikoissijoitusrahasto and in Swedish Specialplaceringsfonden OP-Servicefastigheter.

The Fund is a special common fund referred to in the Act on Alternative Investment Funds Managers (162/2014) to which, in addition to the acts specified above, the provisions of Chapters 3 and 4 of the Finnish Act on Real Estate Investment Funds (1173/1997) on asset investments, borrowing, asset valuation and asset assessment of real estate investment trusts, as well as property appraisers and appraisal shall also apply. The Fund will comply only with these rules, not with the common rules applicable to other funds managed by OP Fund Management Company Ltd.

### **§2 Investing Fund assets**

OP-Public Services Real Estate Fund is a special common fund investing primarily in real estate utilised in social education, physical culture and sports, social welfare, and health care services, which has the objective of achieving long-term capital appreciation by investing its assets in compliance with the Fund rules.

The Fund promotes environmental and social characteristics and, to ensure it, uses environmental, social and governance (ESG) analysis and excludes certain investments. For more information about the ESG methods used, see the fund prospectus.

As a special common fund, the Fund may deviate from the provisions of the Act on Common Funds with respect to investment assets, their diversification, the Fund's NAV calculation, the Fund's opening hours and borrowing.

The Fund's investments are mainly carried out by investing the Fund's assets in real estate securities related to real property in Finland and in direct property holdings as well as in units or shares in Finnish companies for collective investment.

The Fund primarily aims to earn a rental yield on its holdings. The Fund may earn additional yields by investing in limited liability companies or limited partnerships which are engaged in construction and property-development projects.

The Fund may also invest in fixed-income securities for the purpose of cash management and temporary asset investments.

The Fund may invest its assets in exchange traded derivatives and OTC derivative contracts in order to hedge against the risk of adverse market movements, to replace direct investments and to otherwise promote effective portfolio management.

The Fund may invest in fixed-income securities either directly or through mutual funds or special common funds, or by making deposits with credit institutions.

### **§3 Investment vehicles used by the Fund**

The Fund may invest its assets in the following investment vehicles referred to in the Act on Real Estate Investment Funds:

- 1) Real property located in Finland
- 2) Real estate securities related to real property located in Finland
- 3) Securities of companies which mainly operate in the real estate industry. Such securities shall be traded in an EEA state either in a regulated market or on a multilateral trading facility (MTF). Investments may also be made in such securities if their issue terms and conditions stipulate that they must be traded within one year of their issue in an exchange system referred to herein, provided that their trading can in all probability begin before said period expires.
- 4) Bonds/notes, other fixed-income securities and money market instruments issued or guaranteed by European governments, public-sector entities or other public institutions
- 5) Units in mutual funds or UCITS which have been authorised in Finland or another EEA state and which fulfil the requirements of the UCITS Directive based on their national legislation.
- 6) Units in Finnish special common funds.
- 7) Units or shares of other Finnish companies for collective investment engaged in the real estate investment business.
- 8) Exchange traded derivatives and OTC derivative contracts, whose underlying assets may be securities, foreign currencies, interest rates, real property, real estate securities, other assets or indicators describing the performance of the underlying assets. The underlying assets of derivative contracts may also include derivative contracts whose underlying assets may be financial instruments or underlying assets mentioned herein.

Exchange traded derivatives are traded publicly on the official list of stock exchanges or traded in another market that is regulated, regularly operating, recognised and open to the public.

9) Deposits with credit institutions, provided that a deposit is repayable on demand, or can be withdrawn and will mature within 12 months at the latest, and that the credit institution is domiciled in an EEA state.

10) Construction and property-development projects.

Securities and money-market instruments referred to in 3) and 4) above must be traded in a regulated market referred to in the Act on Trading in Financial Instruments or traded in another market in Europe that is regulated, regularly operating, recognised and open to the public. The Fund Management Company maintains a list of the trading venues used by the Fund at any given time. Upon request, the list is available from the Fund Management Company.

To promote effective asset management, the Fund may sign lending and repurchase agreements for securities and money market instruments included in the Fund's assets, provided that such agreements are cleared by a clearing house referred to in the Finnish Act on the Book-entry System and Clearing and Settlement or by a foreign clearing house. If clearing takes place elsewhere, the counterparty to the agreement must be an investment firm referred to in the Act on Investment Services or another investment service provider, and the terms and conditions of the agreement must be conventional and generally recognised in the market.

Diversification of the Fund's investments and other investment restrictions:

These Fund rules use concepts "Total Fund Assets" and "Fund's Net Asset Value". These concepts are defined as follows:

The Fund's total assets are the combined value of the following components:

- Investments acquired based on assets invested in the Fund by its unitholders or on borrowing
- The Fund's unrealised value performance
- The Fund's accrued income and deferred expenses

The Fund's Net Assets equal the Fund's Total Assets less the Fund's liabilities.

1) Three-fifths (3/5) of the Fund's total assets must always be invested in real property in Finland or real estate securities related to such real property. The Fund may make a temporary exception to this requirement at the time of establishing the Fund and subscribing for units as well as selling or buying real property or real estate securities and whenever the Fund's asset cannot otherwise be invested profitably in real property or real estate securities according to the Fund's investment policy. The Fund may also freely invest its assets only in a piece of real property, only in real estate securities related to a piece of real property or only in a single real estate security.

2) Twenty (20) per cent of the Fund's net assets may be invested in the securities and money market instruments of the same issuer as referred to in 3) and 4) below. Such investments which account for more than ten (10) per cent of the Fund's net assets may, however, represent a maximum of forty (40) per cent of the Fund's net assets.

3) A maximum of fifteen (15) per cent of the Fund's net assets may be invested in vehicles as referred to in 5) and 6) below. The Fund's net assets may not be invested in the units of mutual funds, UCITS or alternative investment funds which, according to their rules or Articles of Association, may invest more than 10% of their assets in the units of other mutual funds, special common funds or UCITS.

The Fund's assets may be invested only in the units of mutual funds, UCITS or alternative investment funds or in the units or shares of collective investment undertakings whose annual fixed management fee accounts for a maximum of three (3) per cent of the value of these investment vehicles. In addition to this fixed management fee, a performance-based fee may be charged by the Fund's underlying investee mutual fund, UCITS or alternative investment fund.

The Fund's net assets may also be invested in the units of other funds managed by the Fund Management Company which The Fund Management Company may charge a management fee for such investment vehicles. However, a subscription and redemption fee may be charged for such subscription and redemption only to the extent that the fee is paid to the underlying investee fund. The Fund may hold a maximum of 25% of the units of the same mutual fund, UCITS or alternative investment fund.

4) A maximum of twenty (20) per cent of the Fund's net assets may be invested in the units or shares in Finnish companies for collective investment engaged in the real estate investment business. The Fund may hold a maximum of 50% of the units or shares in such an individual company.

5) A maximum of twenty (20) per cent of the Fund's net assets may be invested in deposits accepted by a single credit institution.

6) A maximum of twenty (20) per cent of the Fund's net assets may be invested in construction and property development.

7) The counterparty risk arising from investment in OTC derivative contracts may not exceed 10% of the net assets of the Fund in terms of the same counterparty, if the counterparty is a credit institution, and in other cases the risk may not exceed 5% of the net assets of the Fund.

Other provisions governing the Fund's investments:

The Fund must have the cash assets required for running its operations.

When investing the Fund's assets, the Fund Management Company may deviate from its investment restrictions for a maximum period of six months from the start of operations, provided that the spread-of-risk principle is observed.

When calculating investment restrictions, the Fund Management Company does not include the assets of other mutual funds, UCITS or alternative investment funds in which Fund assets have been invested.

These investment restrictions will not apply if the Fund Management Company exercises subscription rights related to securities or money market instruments included in the Fund's net assets.

If the limits based on the investment restrictions have been exceeded for reasons beyond the control of the Fund Management Company or due to exercise of subscription rights, its primary concern must be to rectify the situation in the best interests of the unitholders. A maximum of 20% of the Fund's assets may be placed as collateral for derivative, lending and repurchase agreements.

The Fund's risk exposure related to fixed-income investments is monitored using modified duration.

The Fund Management Company must maintain a list of trading venues used by the Fund. The list is available to the public from the Fund Management Company.

The Fund may not invest in real property or real estate securities held by the Fund Management Company, or in real property or real estate securities held by a direct or indirect shareholder with an over 10% shareholding in the Fund Management Company or its parent company.

#### **§4 Fund's borrowing opportunities**

The Fund Management Company may, for the account of the Fund and for the purpose of the Fund's investment operations and asset management, borrow an amount that accounts for a maximum of half (½) of the Fund's total assets. For a special reason, the Fund Management Company may, however, borrow for the Fund's account an amount accounting for a maximum of one-third (⅓) of the Fund's net assets for a temporary purpose connected with mutual fund operations. Such a special reason may pertain, for example, to a purchase of investments, any possible rearrangement of loans included in investments or securing of liquidity in the case of fund unit redemptions.

Loans directly raised by the Fund and loans that may be included in Fund investments must be taken into account in calculating the limits set for borrowing. The amounts of the borrowing limits must always be calculated in relation to the Fund's total assets.

The Fund may take out both fixed-rate and floating-rate loans.

The Fund may, whenever necessary, lodge all of its assets as collateral for loans it has taken out.

### **FUND MANAGEMENT**

#### **§5 Fund management company, custody and use of an agent**

OP Fund Management Company Ltd (hereinafter the Fund Management Company) is responsible for the management of the Fund. It represents the Fund in its own name and acts on its behalf in matters concerning the Fund and exercises the rights associated with the Fund's assets.

The custodian of the Fund is OP Custody Ltd which, in carrying out its duties, may make use of institutions specialising in custody services and overseen by the Financial Supervisory Authority or an equivalent foreign authority.

The Fund Management Company may use agents to assist in its operations. The Key Investor Information Document and the Fund Prospectus provide more detailed information to what extent the Fund Management Company uses them at any given time.

#### **§6 Financial year of the Fund Management Company and the Fund**

The financial year of the Fund Management Company and the Fund is one calendar year.

### **FUND UNITS, ORDERS AND DISTRIBUTION OF DIVIDENDS**

#### **§ 7 Fund unit register and Fund units**

The Fund Management Company maintains a fund unit register of all Fund units, and registers Fund unit transfers. Fund units may be divided into fractions. One Fund unit consists of ten thousand (10,000) fractions of equal size.

The Board of Directors of the Fund Management Company may decide that the Fund shall have unit classes (Unit Class) differing from each other. Each Unit Class may have both accumulation and income units (Unit Type). Unitholders may convert an accumulation unit into an income unit and vice versa.

Unit Classes may differ from each other in terms of a management fee, quotation currency or index, inflation, interest rate, currency or other derivative hedging.

The Board of Directors of the Fund Management Company decides on the issue and subscription terms and conditions of each fund unit class or type that are available in the Fund Prospectus valid at any given time. The subscription terms and conditions may vary in terms of the subscription amount, investment horizon, distribution channel, geographical region or total customer relationship with OP Financial Group.

Each Fund unit entitles its holder to a share of the Fund's assets in proportion to the number of Fund units, with the proportional values of different Unit Classes and Unit Types taken into consideration.

Upon decision by the Fund Management Company's Board of Directors, a Unit Class or Type may be converted into another Unit Class or Type. Unitholders will be notified in advance of the conversion of a Unit Class or Type.

If, during the time of ownership, a unitholder's ownership in a single Unit Class exceeds the minimum subscription of another Unit Class due to a new subscription or fund switching, the Fund Management Company shall, at the unitholder's request, convert ownership to apply to the Unit Class to whose minimum subscription the new holding corresponds at the time of conversion. If, during the time of ownership, a unitholder's ownership in a single Unit Class falls below the minimum subscription of said Unit Class due to redemptions or fund switching, the Fund Management Company has the right, taking into account the principle of equal treatment of unitholders, to convert ownership to apply to the Unit Class to whose minimum subscription the holding corresponds.

If the unitholder has subscribed for a Unit Class directed at a certain market area, the unitholder's ownership may be converted to apply only to the other Unit Class directed at the same market area under the conditions mentioned above. Change of the place of residence of the unitholder does not entitle to Unit Class conversion.

### **§8 Subscription for, redemption and switch of Fund units**

Fund units are available for subscription and redemption at the Fund Management Company and other subscription agents specified in the Fund Prospectus on all days when banks are generally open in Finland (Business Day) and when the NAV is calculated according to §14 of these Rules. Information on the net asset values of Fund units as well as the subscription and redemption fees referred to in §11 below is available to the public at the Fund Management Company and the Fund's other subscription agents on every Business Day.

Subscriptions for and redemptions of Fund units are executed at the NAV that will be confirmed only after the acceptance of subscription, switch and redemption orders.

Clients may make orders for subscription, switch and redemption directly with the Fund Management Company only if this has been specifically agreed on with the Fund Management Company before making an order. In case such an agreement has not been made, the Fund Management Company always, however, has the opportunity to approve all orders delivered to it.

#### Subscription

Subscribers must specify the Unit Class for which they wish to subscribe. A subscription order will be deemed to have been received by the Fund Management Company upon delivery to the Fund Management Company of the required and sufficient details of the subscriber and his/her identity and the amount of the subscription. A subscription order is binding on the unitholder. The subscription order shall be paid upon subscription or, with the permission of the Fund Management Company, before the subscription is confirmed.

Fund units may be subscribed each quarter (in March, June, September and December) at the value quoted on the last business day of each quarter. If a subscription order is received by 16.00 on the last business day of a given quarter, the subscription shall be executed at the fund unit value quoted on the last business day of that quarter. If a subscription order is received after 16.00 on the last business day of a given quarter, the subscription shall not be executed until the last business day of the following quarter, at the fund unit value quoted on that date. The Board of Directors of the Fund Management Company may decide to temporarily make an exception to the above-mentioned restriction regarding subscription times and carry out subscriptions at other times, if this is justified with regard to the Fund's operations. The Fund Management Company may also limit the number of subscriptions to be received.

Subscriptions based on an agreement for a systematic investment plan for mutual funds are outside the scope of the Fund.

Subscription for Fund units can be paid not only in cash but also in terms of property given as subscription in kind, approved on a case-by-case basis by the Fund Management Company's Board of Directors, which is by nature such that it fulfils the requirements set for the investment policy and objectives stated in the Fund rules. Subscription performed using property given as subscription in kind is deemed to have been paid as soon as title to such property has transferred to the Fund.

The Board of Directors of the Fund Management Company may decide on the minimum number of units or the minimum amount with which units may be subscribed for or redeemed in a single transaction. The Fund Management Company shall calculate the number of units subscribed by dividing the subscription payment received, less the subscription fee mentioned in §11, by the net asset value of a unit. The number of subscribed units is calculated with an accuracy of one ten-thousandth (1/10,000) of a unit, with the number of units rounded down. The remainder shall be added to the Fund's capital.

The Fund Management Company may refuse to issue a Fund unit and to accept a Fund unit subscription if it has not received the information required for the execution of the subscription, if the Fund Management Company considers that there is no need for client relationship or if the client relationship is considered to diminish the interest and equality of other unitholders. Such ground for refusal may also arise from a fund subscription which is contrary to the laws of Finland or another country or to the provisions issued by virtue thereof.

A ground for refusal may arise if, for example, the Fund subscriber resides outside the EEA in a country that causes the Fund Management Company a substantial additional reporting burden or an obligation for registration or another action for which the Fund Management Company otherwise has no obligation.

The Fund Management Company may refuse to accept subscription at least in the following case:

1) If the Fund subscriber is a natural or legal person or other legal arrangement that is considered as a US Person (as "US Person" is defined in the national Regulation S under the US Securities Act of 1933)

#### Redemption

Unitholders have the right to have their Fund units redeemed by the Fund Management Company. Similarly, the Fund Management Company is obliged to redeem these Fund units. Any unit certificate received for the subscription must be returned at the time of redemption. Redemption is made from the Fund's assets.

The redemption of Fund units may be executed twice a year (in June and December) at the value prevailing on the last Business Day of each half-year period. If a redemption order is received by 16.00 on the last business day of a given six-month period, the redemption shall be executed at the Fund unit value quoted on the last Business Day of that six-month period. Payment for the redemption is made within twenty (20) banking days of the Fund's Valuation Date. A different payment arrangement may be agreed with the client. Where the cash required for redemption must be obtained by selling the Fund's investments, such sales must be executed without undue delay. After such cash has been received from the sale, payment for redemptions shall be made within twenty (20) Business Days of the Fund's following Valuation Date.

The Fund Management Company and a unitholder may agree that Fund units can alternatively be redeemed by giving the unitholder the number of investment vehicles equalling the redemption price in proportion to the units of the fund concerned held by the redeemer.

The Fund Management Company may, on its own initiative, redeem a unitholder's fund units if there is a weighty reason related to the unitholder for doing so. In addition, the reason must be connected with the fact that the unitholder's holdings in the Fund may give rise to obligations that the Fund Management Company cannot be reasonably required to fulfil. Such weighty reason may arise if, for example, a unitholder moves outside the EEA or resides outside the EEA in a country that causes the Fund Management Company a substantial additional reporting burden or an obligation for registration or another action for which the Fund Management Company otherwise has no obligation.

The Fund Management Company may, on its own initiative, redeem a unitholder's fund units at least in the following situations:

- 1) If, as regards the unitholder in question, the holding of fund units is contrary to the laws of Finland or another country or to the provisions issued by virtue thereof.
- 2) If the unitholder is a natural or legal person or other legal arrangement that is considered as a US Person (as "US Person" is defined in the national Regulation S under the US Securities Act of 1933).

#### Switch

Switching fund units between funds managed by the Fund Management Company may be performed only by redeeming the units of this Fund and subscribing for new units in another fund using the cash received from such redemption.

#### General information

Subscriptions and redemptions can be paid only in euros in Finland, while in the other countries where the Fund has a marketing licence, in the currencies stated in the Fund Prospectus.

### **§ 9 Restriction and suspension of Fund subscriptions and redemptions**

The Fund Management Company may temporarily suspend Fund unit subscriptions and redemptions. Subscriptions and redemptions of fund units may be suspended temporarily only if the equality of the unitholders or another significant interest of the unitholders, in particular, requires it.

Fund unit subscriptions and redemptions may be suspended at least in the following cases:

- 1) The main trading venue of the Fund or a significant number of the trading venues it uses is closed or trading in the venues is restricted or no subscriptions for a fund as the Fund's significant investment vehicle can be made. The above may be the case at least when a minimum of half of the Fund's investment vehicles are not quoted or they cannot be, in the Fund Management Company's view, valued in an acceptable way in view of the equality of unitholders.
- 2) The Fund's NAV calculation is prevented for some reason in a way mentioned in §14 of these Rules.
- 3) Another significant interest of the unitholders exists, similar to the reasons in paragraphs 1) and 2) above
- 4) The Fund Management Company may also temporarily suspend redemptions of fund units in a situation where the Fund Management Company would be required to sell the Fund's assets at a price that is significantly lower than their fair market value.

At the end of a half-year period, if fund units corresponding to more than five (5) per cent of the Fund's net asset value at the end of the half-year period in question are ordered for redemption, the Fund Management Company may restrict the amount of redemptions to be executed if this is in the interests of the Fund's unitholders. The redemptions are executed proportionally to the amount of each redemption order. The Fund Management Company may also decide to restrict redemptions after redemption orders have been submitted to the Fund Management Company. Redemption orders not executed will lapse.

In addition to what is mentioned above, the acceptance of subscriptions may also be suspended or restricted if the Fund has reached such a size that additional investments in the target market or another mutual fund would be in contravention of the interests of unitholders.

If the acceptance of subscriptions is suspended when a subscription based on a systematic investment plan is supposed to be executed, the subscription will be confirmed at the next available value.

The Financial Supervisory Authority may order the issue and redemption of Fund units to be suspended if that is necessary to ensure confidence in securities markets or property markets, to safeguard the interest of unitholders or for another particularly compelling reason.

### **§10 Distribution of dividends**

The Annual General Meeting of the Fund Management Company decides on the dividends distributed and paid to the holders of income units. Distributed to all units in the same proportion, dividends must account for a minimum of three-quarters (¾) of the Fund's profit for the financial year, excluding unrealised value changes. Dividends will be paid no later than one (1) month after the Fund Management Company's Annual General Meeting into the bank accounts notified by the income unit holders, who have been entered in the register maintained by the Fund Management Company on the day of the Annual General Meeting. Dividends may be paid in several tranches, in accordance with the AGM's decision, but no later than the calendar year following the year of dividend determination. Information on the date of the AGM is available to unitholders at the Fund Management Company during its opening hours. If the holder of income units has failed to notify the Fund Management Company of a bank account into which dividends can be paid, dividends which have not been withdrawn within five years of its first withdrawal day shall revert to the Fund.

**FEES**

**§11 Transaction fees relating to Fund units**

The Fund Management Company's Board of Directors shall decide on the amount of fees mentioned in this section. Information on applicable fees can be found in the Key Investor Information Document available from the Fund Management Company and other locations where Fund units may be subscribed.

When determining the subscription price of a Fund unit, the Fund Management Company may add a Subscription Fee, which is a percentage of the subscription value, but no more than four (4) per cent of the Fund's value. Based on a decision taken by the Fund Management Company's Board of Directors, the Subscription Fee may be paid to the Fund in full or in part.

When determining the redemption price of a Fund unit, the Fund Management Company may deduct a Redemption Fee from the net asset value of the unit, which is a percentage of the redemption value.

The Redemption Fee is determined by the time of ownership of units, as follows:

<u>Time of ownership:</u>	<u>Maximum redemption fee percentage</u>
Less than two years	5%
Two years but less than four years	3%
At least four years	1%

Based on a decision taken by the Fund Management Company's Board of Directors, the Redemption Fee may be paid to the Fund in full or in part.

Notwithstanding the above paragraphs, the Fund Management Company may, however, set a minimum fee for individual subscription or redemption transactions, which may be a maximum of eight (8) euros per subscription or redemption transaction.

**§12 Management and custody fees**

In compensation for its services, the Fund Management Company receives a management fee which may vary by Unit Class. The amount of this fee will be calculated daily (fee percentage per year divided by 365) on the Funds value on the calculation day. The payable management fee is deducted from the Fund's value, reducing the unit net asset value. No separate custody fee will be charged from the Fund. The maximum management fee accounts for 3% of the Fund's value. Information on applicable fees can be found in the Key Investor Information Document available from the Fund Management Company and other locations where Fund units may be subscribed.

In addition to the management fee, the Fund's normal operating costs specified below may be charged from the Fund's assets. Typical examples of these costs are listed under the headings below, but the list is not exhaustive.

- 1) Acquiring and exiting Fund properties and preparations for doing this.
  - any possible commissions and expert and consulting fees related to the above
  - taxes and fiscal charges
  
- 2) Developing Fund properties
  - zoning costs
  - road network construction costs
  - costs for new construction
  
- 3) Costs related to the management and control of the property
  - rental arrangement costs
  - charge for housing management and financial costs
  - professional property management costs
  - cleaning costs
  - accounting and other Fund management costs
  - legal service charges
  - legal costs
  - collection costs
  - renovation costs
  - building repair costs
  - taxes and fiscal charges
  - insurance premiums
  
- 4) Fund borrowing costs
  - interest and other fees closely related to borrowing paid to the lender

- 5) Costs related to assessing and appraising Fund assets  
- costs for appraisal related services

## VALUATION

### §13 Calculation of Fund value

The Fund's net asset value is based on the assets of the Fund less its liabilities, which is expressed in euros in Finland. In other countries where the Fund has a marketing licence, the available currencies are listed in the Fund Prospectus. In the calculation of these values denominated in foreign currencies, the same exchange rates are used as in the calculation of the Fund assets.

Real property and real estate securities other than those traded publicly included in the Fund are stated at market value on a quarterly basis by a property appraiser certified by the Finland Chamber of Commerce, in compliance with professional appraisal practice. Real property and real estate securities shall also be appraised when they are bought or sold, when a subscription is paid in terms of property given as subscription in kind or when the Fund's investments are transferred in consideration of redemption.

If the Fund acquires shares in a housing cooperative or housing cooperatives of several different dwelling units at the same time, two different procedures may apply in respect of appraisal. If the Fund has acquired shares as long-term investments and these are to be sold as individual dwelling units, they will be stated at the market value of the individual dwelling units. If the Fund has acquired the dwelling units as a single entity and are not intended as long-term investments and as to be sold as individual dwelling units, they will be valued as a single entity based on market values, in which case valuation may include a quantity discount due to the number of dwelling units.

If the dwelling units have been acquired as part of a larger whole and valued taking account of the quantity discount, in their valuation it is possible to start using a value based on the valuation of individual dwelling units after 12 months of the acquisition, which corresponds to the probable realisable value of the dwelling units and does not include any quantity discount, provided that these dwelling units are intended as the Fund's long-term investments and to be sold as individual dwelling units.

The Fund's equities and standardised derivative contracts are stated at the closing price prevailing in the public price monitoring system. Non-standardised derivative contracts are valued based on generally accepted valuation methods.

Money market instruments are valued at the market rate adjusted with a security-specific risk premium based on their remaining term or at current market value after the market closing time, which is typically an average of the bid and ask price or a closing price available from a public price monitoring system or other reliable source.

Bonds and notes are stated at the market price quoted at the market closing time, which is typically the average of a bid and ask quote or a closing price available from a public price monitoring system or other reliable source.

Fund units are stated at the latest net asset value available for each fund.

The units or shares of Finnish CIUs are stated at the latest available value.

Deposits are valued according to their capital and accrued interest. Loans taken out by the Fund are valued according to the same principles.

The value of the Fund's assets and liabilities denominated in a foreign currency is translated into the euro using generally available exchange rates at 6.00 pm Finnish time.

If the aforementioned reliable value or fair value for a portfolio investment of the Fund is not available, or if the portfolio investment is other than the above, such an investment will be valued in accordance with the objective principles specified by the Board of Directors of the Fund Management Company.

### §14 Calculation of NAV

The Fund Management Company calculates the Fund's NAV per unit quarterly (in March, June, September and December) on the last Business Day of each quarter (Valuation Day). Information on the Fund's NAV is available from the Fund Management Company and all subscription agents within twenty (20) Business Days of the Valuation Day at the latest.

The Fund NAV is the value of the Fund divided by the number of Fund units outstanding, with the differing management fees and dividends to be paid on each Unit Type taken into account when valuing various Unit Classes, a fact that will change the various Unit Classes' and Types' proportion of the Fund's value.

## GENERAL MEETING OF UNITHOLDERS

### §15 General Meeting of Unitholders

A general meeting of unitholders must be held if the Fund Management Company's Board of Directors deems it necessary, or if the auditor, an independent member of the Board of Directors or unitholders accounting for at least one twentieth (1/20) of all Fund units outstanding request in writing that said meeting be held to deal with a particular matter.

The Fund Management Company's Board of Directors shall convene a General Meeting of Unitholders. A notice of the general meeting of unitholders shall be delivered to the unitholders no earlier than four weeks and no later than two weeks prior to the meeting, in the same way as notifications of amendments to the Fund's rules as referred to in §16 of these rules.

The Fund Management Company is obliged to inform unitholders of an initiative submitted to it for convening a meeting, or of other meeting initiatives of unitholders, if the unitholder that proposes the convening of a meeting does not have the required minimum holding. Information on

meeting initiatives shall be delivered to unitholders in the same way as notifications of amendments to the Fund's rules as referred to in §16 of these rules.

In order to attend a Meeting, the Fund's unitholders must register with the Fund Management Company in the manner mentioned in the notice of Meeting no later than the deadline mentioned therein, which may be no earlier than five (5) days before the Meeting. Unitholders have no right to exercise unitholders' rights at the Meeting before their Fund units have been registered or they have notified the Fund Management Company of their title to units and presented proof thereof. The right to attend the unitholders' Meeting and the number of votes at the Meeting shall be determined based on the situation prevailing ten days before the Meeting.

The AGM shall be opened by the Chairman of the Fund Management Company's Board of Directors or another person appointed by the Fund Management Company's Board of Directors.

The AGM shall:

- 1 elect Chairman of the Meeting, who shall appoint a recording secretary;
- 2 draw up and approve the list of votes;
- 3 elect two persons in charge of checking the minutes, and two scrutineers;
- 4 determine that the Meeting has been legally constituted and has a quorum;
- 5 present discusses matters specified in the meeting initiative

Each full Fund unit entitles its holder to one vote at General Meetings of Unitholders. Fractions of Fund units also entitle their holders to voting rights in proportion to the fractions held. Decisions made by the General Meeting are based on a majority vote and the Chairman has the casting vote in case of a tie.

## **OTHER PROVISIONS**

### **§16 Alteration of Fund rules, transfer of Fund management, merger and demerger of the Fund**

The Board of Directors of the Fund Management Company shall decide on any alterations of the Fund rules. Approval for said alterations must be sought from the Finnish Financial Supervisory Authority. If the Financial Supervisory Authority does not stipulate otherwise, an alteration of the Fund rules shall enter into force within one month of the date when the Authority has approved the alteration and unitholders have been notified thereof. Unitholders shall be considered to have been notified of an alteration on the fifth day of posting the related notification, or on the day when the notification has appeared in a national newspaper published in Helsinki or has been sent, with the unitholder's consent, by email or using some other means of electronic communications.

Upon entry into force, the alteration shall apply to all unitholders and all investments made before the alteration's entry into force.

In case the Fund rules are altered, Fund management is transferred to another fund management company or the Fund merges with other funds or the Fund demerges, the unitholders have the right to demand redemption within one month of the date when the decision on any of the aforementioned actions was made. In such a case, the Fund Management Company shall execute the redemption order in compliance with the redemption procedures described above.

If the Fund Management Company's Board of Directors decides to alter the Fund rules, transfer Fund management to another fund management company, merge the Fund with another one or demerge the Fund, the unitholders will have the right, notwithstanding these Rules, to demand redemption of their units before any of said actions were taken. The Fund Management Company's Board of Directors shall make a decision on any extra redemption days. The unitholders shall be notified of the decision as described in §15 above.

### **§17 Information on the Fund and the Fund Management Company**

The Fund Prospectus, the Key Investor Information Document, the Fund's half-yearly report, the Annual Reports of the Fund Management Company and the Fund as well as a list maintained by the Fund Management Company of markets available to the funds it manages are available to the public at the Fund Management Company and other subscription agents during their opening hours. Half-yearly reports shall be published within two months of the end of each review period, and the Annual Reports of the Fund and the Fund Management Company within three months of the end of the financial year.

### **§18 Remuneration**

A significant part of the variable remuneration to the Fund Management Company's employees to whom the Fund Management Company's incentive scheme under the Act on Common Funds is applied shall be paid in fund units of the fund in question or in equivalent financial instruments that are as effective inducements as fund units.

### **§19 Applicable law**

The operations of the Fund Management Company and the Fund shall be construed and governed by the laws of Finland. However, agreements may be concluded for the Fund's account to which national laws of another country shall apply.

*This document is a translation. The Finnish Financial Supervisory Authority has confirmed these rules in Finnish. If there are any discrepancies between the translation and the original Finnish document, the Finnish document shall prevail.*