

## Investment Regulations

Having regard to Art. 6 of the articles of association of the simply3a Foundation (“Foundation”), the Board of Trustees shall adopt the following investment regulations:

### Art. 1 Purpose

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These regulations govern the principles that must be observed when investing the pension assets in securities.

### Art. 2 General

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1. The Foundation may offer account and securities solutions. In the case of securities solutions, a distinction is made between the following categories:
  - a. **“Advisory”**: The pension assets are invested in OPO 2-compliant (Occupational Pension Ordinance) collective investments at the Client’s discretion. The Foundation, an advisor contractually affiliated with the Foundation or an asset manager contractually affiliated with the Foundation provides the relevant investment advisory services. The Client decides on the implementation of investment recommendations either actively by consent or passively by not objecting. It shall be noted in the benefits agreement whether consent has to be active or passive.
  - b. **“Asset Management Mandate”**: The pension assets are managed on a discretionary basis by the Foundation or an asset manager in accordance with the requirements of Art. 5 para. 3 OPO 3 and the benefits agreement.
2. The Foundation decides on the securities offered and may change them at any time.
3. Fees for the custody and management of investments can be found in the fee regulations and the benefits agreement.
4. The securities solutions offered to Clients and their margins can be found in the annex to these investment regulations.

### Art. 3 Principles for the management of investments

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1. *Liquidity*: The promised benefits must be payable on time at any time.
2. *Security*: The Client selects his investment strategy only after undergoing a risk assessment, which assigns the Client a risk category based on his investment horizon, loss tolerance, savings ratio and total assets.
3. *Diversification*: The principles of risk diversification must be observed at all times and compliance therewith must be conclusively documented and demonstrated. In the case of collective investments, the debtor risk is in principle the risk of the underlying assets on which the collective investment is based.

### Art. 4 Expansion of the investment options

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1. On the basis of Art. 50 para. 4 OPO 2, the Foundation also offers Clients an expansion of the permissible investments subject to Art. 5 and 6 of these regulations.
2. The benchmarks of the expanded investment options are specified by the Foundation in the annex to these investment regulations.
3. The Foundation or the advisor alerts Clients to the specific risks if they make use of the expansion option and explains the investments to them.
4. In accordance with Art. 50 para. 4 OPO 2, the Foundation states in its annual financial statements that the provisions regarding security and risk distribution laid down in Art. 50 para. 1–3 OPO 2 are complied with.

### Art. 5 Principles in the event of an expansion of investment options

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The following principles must be observed in the event of an expansion of the investments:

1. *Investments in money market funds in foreign currencies with no currency hedging*:  
Are permitted in euros, US dollars, Japanese yen, pounds sterling, Canadian dollars, Australian dollars, New Zealand dollars, Swedish kronor or Danish kroner.
2. *Investments in bond funds in foreign currencies with no currency hedging*:  
Are permitted in euros, US dollars, Japanese yen, pounds sterling, Canadian dollars, Australian dollars, New Zealand dollars, Swedish kronor or Danish kroner.
3. *Investments in equity funds with no currency hedging*:  
Are permitted in euros, US dollars, Japanese yen, pounds sterling, Canadian dollars, Australian dollars, New Zealand dollars, Swedish kronor or Danish kroner.
4. *Investments in real estate*:  
These investments may only involve investments in collective investments where the net asset value (NAV) is calculated at least once a week.
5. *Alternative investments*:  
Include, inter alia, hedge funds and investments in commodities, infrastructure and private equity. These alternative investments may only involve investments in collective investments where the net asset value (NAV) is calculated at least once a month. Non-diversified collective investments (such as ETFs, gold) may account for a maximum of 5% of the capital assets.

#### **Art. 6 Category limits for expanded investments**

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The following limits apply to individual investment categories of the expanded investment options in relation to the available pension assets:

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| 1. Investments in foreign currencies (with no currency hedging)             | 50 %  |
| 2. Investments in equity funds, similar securities and other participations | 100 % |
| 3. Investments in real estate funds of which maximum one third abroad       | 30 %  |
| 4. Alternative investments max. 5 % per non-diversified investment          | 20 %  |

#### **Art. 7 Investment guideline compliance and monitoring**

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- The Foundation ensures that all securities solutions offered by the Foundation are compliant with the investment provisions laid down in Art. 5 para. 3 OPO 3 in conjunction with Art. 49–58 OPO 2, subject to any expansions in accordance with Art. 4 et seq. of these investment regulations.
- The persons entrusted with asset management shall ensure that the Clients' portfolios are consistent with the strategy selected by the respective Client and the investment provisions applicable in each case. The Foundation shall monitor compliance on a regular basis. If the investment provisions are not complied with temporarily for any reason, the persons entrusted with asset management shall, of their own accord, promptly restore due legal and contractual compliance. Moreover, the Foundation is entitled to make any necessary adjustments to the custody account independently.

#### **Art. 8 Model portfolios**

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- The persons entrusted with asset management shall maintain a model portfolio for each investment strategy offered. The model portfolio is checked in advance by the Foundation for compliance with the legal provisions and the investment restrictions defined in these investment regulations and must be approved by the Foundation before being implemented. Amendments to the model portfolio (including exchanging securities) must also be approved in advance by the Foundation.
- Contributions by the Client are invested in line with the current composition of the model portfolio at the time and not according to the assets in the respective custody account.
- The need for any rebalancing is checked at least once a quarter and carried out, if required.

#### **Art. 9 Accounting principles**

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- Cash and cash equivalents are accounted for at their nominal value, while all other investment categories are accounted for at market value.
- The Foundation determines the price and NAV providers for valuing custody accounts.

#### **Art. 10 Authoritative language**

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If there are differences between different language versions, the German regulations shall be authoritative.

#### **Art. 11 Omissions in the regulations**

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Insofar as these regulations do not contain any provisions for special circumstances, the Board of Trustees shall make a provision corresponding to the purpose of the Foundation.

#### **Art. 12 Changes to the regulations**

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The Board of Trustees may decide to amend these investment regulations at any time. The version applicable at any given time may be requested from the Foundation's respective Client portal.

#### **Art. 13 Legal validity**

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These investment regulations will come into force on the date the Foundation is established.