



Investor Information on the implementation of Regulation (EU) 2016/1011 for the investors of the Lupus alpha Fund managed by Lupus alpha Investment GmbH pursuant to Part I of the Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment (UCITS)

Regulation (EU) 2016/1011 of 08 June 2016, also referred to as the “EU Reference Values Regulation” (hereinafter referred to as the “Reference Values Regulation”) shall enter into force on 01 January 2018 pursuant to Article 59 (2) of the Reference Values Regulation. Reference values are often colloquially referred to as “benchmarks” and serve as a yardstick for comparing performance. The objective of the Reference Values Regulation is to strengthen confidence in the financial markets and to preserve the integrity of the financial markets. Reference values are susceptible to manipulation, as the providers of reference values may have a vested interest in a certain development of the reference value offered. This can lead to market failures or doubts about the accuracy and integrity of benchmarks, undermine market confidence, cause losses to consumers and investors, and distort the real economy.

I. Applicability of the Reference Values Regulation for Lupus alpha Investment GmbH

Lupus alpha Investment GmbH is a supervised entity pursuant to Article 3 No. 17 b) of the Reference Values Regulation and uses a reference value for calculating the performance fees pursuant to Article 3 No. 7 e) of the Reference Values Regulation. Accordingly, Lupus alpha Investment GmbH shall only use reference values pursuant to Article 29 (1) of the Reference Values Regulation.

II. List of reference values used by Lupus alpha Investment GmbH

STOXX Europe Total Market Small Net Return EUR
MSCI Europe Micro Cap Net Total Return (EUR)
MDAX Performance Index / SDAX Performance Index
EURO STOXX Total Market Small (Net Return) EUR
Thomson Reuters Global Focus Hedged Convertible Bond Index (EUR)
STR

The reference values listed here are used by the company to determine the investment performance premiums (performance fee) as part of the company’s remuneration.

III. Reference values according to Article 3 No. 7 e) Reference Values Regulation (investment performance premiums)

STOXX Europe Total Market Small Net Return EUR
MSCI Europe Micro Cap Net Total Return (EUR),
MDAX Performance Index / SDAX Performance Index
EURO STOXX Total Market Small (Net Return) EUR
Thomson Reuters Global Focus Hedged Convertible Bond Index (EUR)
€STR

The reference values listed under point 3 or their administrators must, subject to the transitional provisions in Art. 51 Reference Values Regulation, be filed in the ESMA register for reference values or in the ESMA register for administrators. The company does not check the offering parties, but the deposit in the register.

The designated ESMA registers are available at <https://www.esma.europa.eu/databases-library/registers-and-data>.

IV. Possible alternative reference values according to Article 28 (2) Reference Values Regulation

Reference value	Possible alternative reference values
STOXX Europe Total Market Small Net Return EUR	MSCI Europe SMID TR
MSCI Europe Micro Cap Net Total Return (EUR),	MSCI EMU Small Cap net TR in EUR
MDAX Performance Index / SDAX Performance Index	MSCI Germany Mid Cap Loc Net / MSCI Germany Small Cap Daily Net TR EUR
EURO STOXX Total Market Small (Net Return) EUR	MSCI EMU Small Cap net TR in EUR
€STR	European Money Markets Institute (EMMI) will temporarily present an substitute reference value. Forward projection of the reference interest rate if required and in the investor's interest.
Thomson Reuters Global Focus Hedged Convertible Bond Index (EUR)	Bloomberg Barclays Global Convertibles EUR TR Hedged EUR

If a reference value is subject to a significant change or is no longer provided by the Administrator, it will be replaced immediately by the substitute reference value. A material change in a benchmark occurs when the benchmark is no longer consistent with the investment objectives or strategy of the relevant fund (e.g. redefinition small- & mid-cap from below 5 billion to below 10 billion). Given that Lupus alpha primarily only uses reference values from large providers such as MSCI INC. or STOXX Limited, the substitute benchmark is selected from one of the large providers (MSCI INC., S&P Dow Jones Indices LLC, STOXX Limited or Bloomberg L.P.) if the reference value composition is almost identical (> 95 %). If the alternative reference value does not match the reference value to be replaced by more than 95%, an alternative reference value with the highest available coverage ratio will be used, provided that the replacement reference value is appropriate and in the interest of the investor.



The substitute benchmarks listed in the table above must be used; there is no discretionary leeway. An exchange of the substitute reference value is subject to the approval of the Executive Committee and must be published in the organisation manual without delay.

Lupus alpha Investment GmbH

Executive Board