

# Information for investors in funds managed by Credit Suisse Fund Management S.A.

Additional Information for Investors  
Luxembourg, July 2021

## Handling of Complaints

In accordance with Article 112 of the Luxembourg Law of 17 December 2010 relating to Undertakings for Collective Investment, as well as in accordance with Article 7 of the CSSF Regulation Nr. 10-4 transposing Commission Directive 2010/43/EC of 1 July 2010 and Circular CSSF 18/698, as may be amended from time to time, Credit Suisse Fund Management S.A. (hereafter "the Company") is under the legal obligation to establish, implement and maintain effective and transparent procedures for the reasonable and prompt handling of complaints received from investors.

In general, a complaint occurs whenever an investor raises a concern, a grievance or dissatisfaction about the execution of the Company's activities. A complaint is filed to recognize a right or to redress a harm. Thus, simple requests for information or clarification cannot be considered as complaints. In particular, a complaint may include, but is not limited to, any assertion by an investor of:

- improper conduct by the Company;
- breach of a rule or regulation by the Company, in particular those of the managed investment funds;
- operational failures;
- investment performance of the funds managed by the Company.

A complaint may also include a demand, express or implied, for a financial compensation or adjustment.

Investors are able to file complaints free of charge with the Company or with any distributor appointed by the Company to accept applications for the subscription or redemption of units of funds managed by the Company.

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### Complaints addressed directly to the Company

Every complaint must be submitted in written, including the identification of the investor and describing the essence and details of the complaint.

In case you are an investor and you wish to address a complaint to the Company, please send your concerns to Credit Suisse Fund Management S.A., 5, rue Jean Monnet, P.O. Box 369, L-2013 Luxembourg. Investors shall note that a complaint can be also addressed by e-mail to [fundcomplaints.luxembourg@credit-suisse.com](mailto:fundcomplaints.luxembourg@credit-suisse.com).

The investor will be informed of the name and contact details of the person handling the complaint. A written acknowledgement of receipt will be provided to the complainant within 10 business days after receipt unless the answer itself is provided to the complainant within this period.

The Company will strive to provide an answer without undue delay and, in any case, within a period not exceeding one month between the date of receipt of the complaint and the date at which the answer to the complainant is sent. Where an answer cannot be provided within this period, the complainant will be informed of the causes of the delay and receive an indication of the date at which its examination is likely to be achieved.

If negative, the answer provided will be duly motivated. Where the complainant reiterates that the answer is not satisfactory, the Company will inform the investor in writing of the existence of the out-of-court complaint resolution procedure at the Commission de Surveillance du Secteur Financier (CSSF) in line with CSSF Regulation 16-07.

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### Complaints addressed to an appointed distributor

The Company has entered into contractual arrangements with appointed distributors to advise on or sell the funds it manages. The distributors shall ensure the reasonable and prompt handling of complaints received from investors. Where necessary, the appointed distributor may undertake to seek to coordinate the response in relation to such complaints with the Company.

## Best Execution Principles

In accordance with the Luxembourg Law of 17 December 2010 relating to Undertakings for Collective Investment, as well as in accordance with Article 28 and 29 of the CSSF Regulation Nr. 10-4, implementing Directive 2009/65/EC, Circular CSSF 18/698, the Luxembourg Law of 12 July 2013 on Alternative Investment Fund Managers and Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU, as may be amended from time to time, Credit Suisse Fund Management S.A. (hereafter “the Company”) is under the obligation to act in the best interests of the UCITS respectively the Alternative Investment Funds (“funds”) it manages when executing decisions and/or when placing orders with other entities to deal on behalf of the managed funds in the context of management of their portfolios.

In general, the Company is delegating the function of portfolio management, including the placement and execution of orders on behalf of the funds it manages to third parties which are subject to a regulatory supervision in an EU member state or, if the third party is domiciled in a non-EU country, subject to a regulatory supervision which is deemed equivalent to the supervision in an EU country.

The Company ensures that the third parties to which these activities are delegated, are subject to best execution rules and that they have implemented related policies and procedures, including a Best Execution policy. The third parties shall in particular take all reasonable steps to obtain the best result for the funds, taking into account price, cost, speed, likelihood of execution and settlement, order size and nature, or any other consideration relevant to the order.

In this context the following criteria are relevant:

- The objectives, investment policy and risks specific to the funds on behalf of which the order is placed
- The characteristics of the order
- The characteristics of the financial instrument that is the subject of the order
- The characteristics of the execution venues to which the order can be directed

The third parties shall monitor on a regular basis the effectiveness of their arrangements and policy for the execution of orders on behalf of the funds. The third parties must be able to demonstrate that they have executed and placed the orders on behalf of the Company in accordance with their Best Execution policy. The Company has entered into contractual arrangements with the third parties that shall ensure the application of Best Execution Principles and that shall allow the Company to perform appropriate due diligence and controls on the third parties. In this context, the Company has established and implemented specifically designed policies and procedures in order to make sure that any risks of non-compliance are adequately mitigated.

The before mentioned principles do not apply where there is no choice of different execution venues.

## Management of Conflicts of Interest

In accordance with the Luxembourg Law of 17 December 2010 relating to Undertakings for Collective Investment, as well as in accordance with Chapter III of the CSSF Regulation Nr. 10-4, implementing Directive 2009/65/EC and Circular CSSF 18/698, as well as the Luxembourg Law of 12 July 2013 on Alternative Investment Fund Managers and Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU, as may be amended from time to time, Credit Suisse Fund Management S.A., (hereafter “the Company”) is under the legal obligation to establish, implement and maintain an effective Conflicts of Interest policy.

In the conduct of its business the Company's policy is to identify, manage and where necessary avoid any action or transaction that may pose a conflict between:

- the Company, including its managers, employees or any person directly or indirectly linked to the Company by control, and the funds managed by the Company or the investors in these funds; or
- a fund or the investors in that fund, and another fund or the investors in that fund; or
- a fund or the investors in that fund and another client of the Company; or
- two clients of the Company.

The Company strives to manage any conflicts in a manner consistent with the highest standards of integrity and fair treatment. For this purpose, it has implemented procedures that shall ensure that any business activities potentially involving a conflict are carried out with an appropriate level of independence and that any conflicts are resolved fairly.

In the unlikely event that a conflict of interest could not be managed by the Company, any such non-neutralised conflicts as well as the decisions taken will be disclosed appropriately.

## Voting Rights Principles

The Company will, in principle, exercise voting rights attached to the instruments held in the funds it manages, to protect the interests of investors. The decision to exercise voting rights, in particular the determination of the circumstances referred to above, is in the sole discretion of the Company. The Company may ask a Proxy Advisor to provide research and voting recommendations as well as to assist the Company in exercising the voting rights. Details of the actions taken will be made available to investors free of charge upon request. For investments in equities of companies that are domiciled in the European Economic Area (EEA) and are listed on a recognized trading venue in the EEA, investors can also refer to the Engagement Policy Statement of Credit Suisse Asset Management, which applies to the Company. Information on implementation of the Engagement Policy Statement is disclosed in the Proxy Voting Dashboard. This includes a general description of voting behavior and the votes cast in general meetings. The Proxy Voting Dashboard is accessible under:

[https://vds.issgovernance.com/vds/#/MTEOMjA=](https://vds.issgovernance.com/vds/#/MTEOMjA=/)

## Remuneration Principles

In accordance with the Luxembourg Law of 17 December 2010 relating to Undertakings for Collective Investment, as well as in accordance with Article 28 and 29 of the CSSF Regulation Nr. 10-4, implementing Directive 2009/65/EC, Circular CSSF 18/698, the Luxembourg Law of 12 July 2013 on Alternative Investment Fund Managers and Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU, as may be amended from time to time, and the Guidelines on sound remuneration policies under the AIFMD, Credit Suisse Fund Management S.A. (hereafter “the Company”) applies the remuneration principles and policies of Credit Suisse Group AG (hereafter “the Group”). In addition, the Company has developed an Appendix to the Group Compensation Policy to specify the remuneration standards at Company level.

The key objectives guiding the Company’s remuneration approach as laid out in the Group Compensation Policy are:

- Sound and effective risk management that does not encourage risk-taking activities;
- High conduct and ethical standards through a system of malus and rewards;
- Teamwork and collaboration across the Group;
- Balanced distribution of profitability between shareholders and employees over the long term;
- Create sustainable value for the Group’s shareholders;
- Performance culture based on merit that differentiates and rewards excellent performance;
- Attraction and retention of employees, motivated to achieve results with integrity and fairness;
- Proportion of variable compensation is appropriate for the role and encourages appropriate behaviours and actions.

The Group has a Compensation Committee which supervises compensation policies and practices, procures independent external compensation advice, recommends changes to the Compensation Policy or overall plans to the Board of Directors, and approves compensation of Executive Board and Board of Directors among other tasks.

In addition, the Company has defined a group of employees identified as “Risk Takers” (e.g. managers in charge of the control functions – Risk Management, Compliance, Internal Audit).

The main parameters for the remuneration may comprise some or all of the following:

- Fixed component (such as annual salary);
- Variable component (such as performance bonus);
- Complementary pension scheme;
- Other additional benefits.

## Sustainability-related disclosures (SFDR)

In accordance with the Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability-related disclosures in the financial services sector (SFDR), Credit Suisse Fund Management S.A. (hereafter “the Company”) has endorsed a Sustainability Investing Policy developed at Credit Suisse Asset Management level which provides the approach undertaken in terms of consideration and integration of sustainability risks in the investment decision process.

In addition, the Company in line with the approach of Credit Suisse Asset Management considers principal adverse sustainability impacts (PASI) in its investment decisions and advisory processes. Engagement policies and other related sustainability policies and commitments are disclosed and accessible under: [ESG \(credit-suisse.com\)](https://www.credit-suisse.com).



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