



PROSPECTUS UCI/FUND

IMGA Money Market (formerly called IMGA Extra Tesouraria III)

Open-Ended Money Market Fund

April 8th 2024

The authorisation of the FUND by the CMVM is based on legality criteria and does not entail any guarantee by the latter as to the sufficiency, veracity, objectivity or timeliness of the information provided by the entity responsible for managing it in the Management Regulation, nor any judgment on the quality of the securities that make up the FUND's assets.

Disclaimer: This Sales Prospectus was drawn up in Portuguese and translated into English. Only the Portuguese version is legally binding.

INDEX

Part I - Management Regulation	3
Chapter I - General Information about the FUND, the Management Company, and Other Entities	3
1. The FUND.....	3
2. The Management Company	3
3. Subcontracted entities	4
4. The Depository	4
5. Distributors.....	4
Chapter II - Investment policy of the FUND's Assets/Income Policy	5
1. Investment policy of the FUND	5
2. Derivative Financial Instruments, Repos, and Loans	10
3. Assets' valuation.....	11
4. Exercising voting rights.....	12
5. Ongoing Charges	12
6. Current Charges Table	13
7. Fees and charges to be applied to the FUND	14
8. Income distribution policy.....	15
Chapter III - Units and Conditions for Subscription, Transfer, and Redemption	15
1. General Characteristics of the Units.....	15
2. Unit value	15
3. Subscription and redemption conditions	16
4. Subscription conditions	16
5. Redemption conditions	16
6. Suspending unit subscriptions and redemptions	17
7. Admission to trading	17
Chapter IV – Rights and Obligations of the Unitholders	17
Chapter V - The Liquidation Conditions of the FUND	18
Part II - Additional information applicable to open-ended UCI.....	18
Chapter I - Other information on the Management Company and Other Entities	18
1. Other Information on the Management Company	18
2. External Investment Advisors.....	19
3. FUND Auditor	19
4. FUND Supervisory Authority	19
5. Remuneration Policy	19
Chapter II – Disclosing Information	20
1. Unit Value	20
2. Portfolio Details.....	20
3. Documentation.....	20
4. Reports and Accounts.....	20
Chapter IV - Target Investor Profile.....	23
Chapter V - Tax Regime.....	23
1. FUND-Related Taxation	23
2. Unitholders Related Taxation	24
Annex 1 - Funds Managed by the Management Company on December 31st 2022	26
Annex 2 - Pre-contractual disclosure for financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and the first paragraph of Article 6 of Regulation (EU) 2020/852	27

Part I - Management Regulation

Chapter I - General Information about the FUND, the Management Company, and Other Entities

1. The FUND

- a) The fund is named 'IMGA Money Market – Fundo de Investimento Mobiliário Aberto do Mercado Monetário', hereinafter and in an abbreviated manner, as FUND.
- b) The FUND is established as an Open-Ended Money Market Fund. The creation of the FUND was authorised by the Portuguese Securities Market Commission, hereinafter CMVM, on July 19th, 2010, and became effective on August 4th, 2010, i.e., the date on which the first units were issued, pursuant to the conditions described in this prospectus.
- c) On November 16th, 2015 the FUND changed its name from 'Millennium Extra Tesouraria III – Fundo de Investimento Alternativo Mobiliário Aberto' to 'IMGA Extra Tesouraria III – Fundo de Investimento Alternativo Mobiliário Aberto'.
- d) On June 18th, 2019, the CMVM authorised the transformation of the FUND into an Undertaking for Collective Investment in Securities.
- e) On July 31st, 2019, and following the CMVM's authorisation, the Fund became a Standard Variable Net Asset Value Money Market Fund, in accordance with Regulation (EU) 2017/1131 of the European Parliament and of the Council, of June 14th, 2017. On that date, its name was changed to 'IMGA Money Market – Fundo de Investimento Mobiliário Aberto do Mercado Monetário'.
- f) The Prospectus was last updated on April 8th 2024.
- g) On December 31st, 2023, the FUND had 15.307 Unitholders, in Unit Class A and 14 Unitholders, in Unit Class R and 2 Unitholder in Unit Class I .
- h) Unit Class I started being distributed on November 28th, 2019 and was established on February 14th, 2022.
- i) Unit Class R started being distributed on April 1st, 2021 and was established on May 4th, 2021.

2. The Management Company

- a) The FUND is managed by IM Gestão de Ativos, Sociedade Gestora de Organismos de Investimento Coletivo, S.A., headquartered at Avenida da República, nº 25 – 5ªA, Lisboa, registered at the Commercial Registry Office of Cascais under the single registration and taxpayer no. 502 151 889.
- b) The Management Company is a Limited Company whose share capital, fully paid up, is 1,000,000 Euros.
- c) The Management Company was established on April 14th 1989; it began operating on June 1st 1989 and is registered at the CMVM as a financial intermediary since July 29th 1991.
- d) Among other obligations and duties that may be conferred upon it by law, the Management Company is responsible for:
 - Managing the investment, performing the necessary acts and operations for a successful implementation of the investment policy, in particular:
 - i. Managing its portfolio, including their selection, acquisition and disposal of assets, in accordance with the procedures necessary for their proper and regular transmission and the exercise of their rights in connection with them; and
 - ii. Managing the risk associated with the investment, including its identification, assessment, and monitoring.
 - Managing the FUND, in particular:
 - i. Providing the necessary legal and accounting services for the FUND's management, without prejudice to any specific legislation applicable to these activities;
 - ii. Clarifying and analysing questions and complaints submitted by Unitholders;
 - iii. Assessing the portfolio and determining the value of the units and issuing tax returns;
 - iv. Complying and ensuring compliance with the applicable rules, the FUND's instruments of incorporation and any contracts concluded in the course of its business;
 - v. Register Unitholders, where applicable;

- iv. Issuing, redeeming or repurchasing units;
 - vii. Carrying out settlement and clearing procedures, including sending certificates;
 - viii. Recording and keep documents.
- c) The Management Company is accountable to the Unitholder for non-compliance or defective compliance with the applicable legal and regulatory duties and obligations arising from the instruments of incorporation of Undertaking for Collective Investment.
- d) The replacement of the Management Company is subject to authorisation by the CMVM, provided that the interests of the Unitholders and the regular functioning of the market are not affected.

3. Subcontracted entities

The FUND does not resort to subcontracted entities.

4. The Depositary

- a) The Depositary of the FUND's assets is Banco Comercial Português, S.A., headquartered at Praça D. João I, n.º 28, Porto, registered, since July 29th 1991, as a financial intermediary with CMVM.
- b) Among other obligations and functions that may be conferred upon it by law or this Prospectus, the Depositary is responsible for:
- i. Complying with the law, regulations, the FUND 's instruments of incorporation, and any contracts concluded with the Management Company within the scope of the FUND, namely regarding the acquisition, disposal, subscription, redemption, repayment or extinction of units in the undertaking for collective investment;
 - ii. Keeping the FUND's assets, except for cash;
 - iii. Receiving as deposit or registering the FUND's assets;
 - iv. Carrying out the instructions of the Management Company, unless they are contrary to the applicable legislation and the instruments of incorporation;
 - v. Making sure that, in transactions relating to the assets that make up the FUND, the consideration is delivered within deadlines in accordance with market practice;
 - vi. Promoting the payment of the income from the units and their redemption, repayment or liquidation proceeds to the Unitholders;
 - vii. Preparing and updating the chronological list of all the transactions carried out for the FUND;
 - viii. Preparing a detailed monthly inventory of the assets and the liabilities of the FUND;
 - ix. Supervising and assuring before the Unitholders that the law, regulations, and the UCI's instruments of incorporation are complied with, namely with regard to the investment policy, including the investment of income, the FUND's income distribution policy, the calculation of the value, the issue, redemption, repayment, and cancellation of registration of units, as well as to conflicts of interest;
 - x. Sending an annual supervision report to the CMVM, pursuant to CMVM's regulations and immediately informing the CMVM of any non-compliance that may affect the Unitholders;
 - xi. Immediately informing the Management Company of any changes in the members of the governing board.
 - xii. It shall also ensure an adequate monitoring of the FUND's cash flows, as determined by law.
- c) The replacement of the Depositary is subject to authorisation by the CMVM. The aforementioned Depositary's functions shall only cease once the new Depositary's functions begin, and the former entity must immediately inform the CMVM of such a change.
- d) Banco Comercial Português, S.A. is the entity responsible for registering the FUND's units assigned to Unit Class A.
- e) The FUND's units included in Unit Classes I and R are integrated into the centralised securities system, managed by Interbolsa.

5. Distributors

- a) The entities responsible for distributing the FUND's units among Investors are:
- Unit Class A: Banco Comercial Português, S.A., headquartered at Praça D. João I, n.º 28, Porto;
 - Unit Class A: Banco ActivoBank, S.A., headquartered at Rua Augusta, 84, Lisboa;
 - Unit Class I: Management Company – IM Gestão de Ativos, Sociedade Gestora de Organismos de Investimento Coletivo, S.A. (IMGA);

Unit Class R: Bison Bank, SA, headquartered at Rua Barata Salgueiro, nº 33, piso 0, Lisboa;
 Unit Class R: Banco Invest, S.A., headquartered at Av. Eng. Duarte Pacheco, torre 1, 11º andar, Lisboa.
 Unit Class R: BEST – Banco Electrónico de Serviço Total, S.A., headquartered at Praça Marquês de Pombal, 3 – 3º, 1250-161 Lisboa.
 Unit Class R: BNI – Banco de Negócios Internacional (Europa), S.A., headquartered at Avenida Eng. Duarte Pacheco, C. C. Amoreiras, Torre 1, 7º Piso, 1070-101 in Lisboa.

b) The FUND is distributed:

Unit Class A:

- At Banco Comercial Português, S.A., via Millenniumbcpc branches, the Millenniumbcpc telephone banking service (+351 707 502 424, +351 918 272 424, +351 935 222 424, +351 965 992 424) and the website www.millenniumbcpc.pt, for customers who have subscribed to these services.
- At Banco Activobank, S.A., via the Activo line (+351 707 500 700) and the website www.activobank.pt, for customers who have subscribed to these services.

Unit Class I:

- At Managing Company IM Gestão de Ativos's registered office.

Unit Class R:

- At Bison Bank's headquarters
- At all Banco Invest, S.A. branches and online www.bancoinvest.pt for customers who have subscribed to this service.
- At BEST- Banco Electrónico de Serviço Total, S.A. Investment Centres, which are agencies of Banco BEST, and through distance distribution channels: Internet www.BancoBest.pt, App and telephone 218 505 775 (business days, from 8 a.m. to 10 p.m.).
- BNI – Banco de Negócios Internacional (Europa), S.A. headquarters.

Chapter II - Investment policy of the FUND's Assets/Income Policy

1. Investment policy of the FUND

1.1. Investment policy

The FUND will seek to provide Unitholders with an investment with low volatility and a stable level of potential profitability above the alternatives offered by traditional banking investments, by investing exclusively in bank deposits and money market instruments such as commercial paper, short-term public debt securities, namely treasury bills, fixed-rate bonds, with a residual maturity of less than 397 days, and other debt instruments of an equivalent nature, expressed directly or indirectly in Euros, issued by private entities or issued or guaranteed by a EU Member State, or by international public bodies. Financial instruments subject to periodical profitability adjustments according to money market conditions at least once every 397 days will also be considered money market instruments.

The investment strategy follows an active management approach, not considering any benchmark parameters. Assets are selected essentially on the basis of their return potential in relation to the quality of the issuers and the macroeconomic context in which they operate, refraining from investing in controversial sectors and favouring companies that adopt best practices in terms of Governance, Human Rights, and Environment within the universe of issuers. The Fund does not follow a fixed sectoral or geographical allocation, seeking the exposure combination that at any given moment appears most appealing based on relevant issuer information within its investment universe and market conditions.

The Management Company considers the following sectors as controversial: Gambling, Controversial Weapons, Tobacco, and Thermal Coal, or companies that have most of their revenue coming from these activities.

The UCI may invest in:

- a) Money market instruments, including financial instruments issued or guaranteed individually or jointly by the European Union, the national, regional and local administrations of the Member States or their central banks, the European Central Bank, the European Investment Bank, the European Investment Fund, the European Stability Mechanism, the European Financial Stability Fund, a central authority or the central bank of a third country, the International Monetary Fund, the International Bank for Reconstruction and

- Development, the Council of Europe Development Bank, the European Bank for Reconstruction and Development, the Bank for International Settlements or any other relevant financial organisation or institution in which one or more Member States are represented;
- b) Bank deposits, all denominated in Euros, provided that they are repayable upon request at any time and provided that they mature within a maximum of 12 months;
 - c) Securitisations and commercial papers guaranteed by eligible assets (ABCP), pursuant to Article 11 of Regulation (EU) 2017/1131 of the European Parliament and of the Council, of June 14th, 2017;
 - d) Derivative financial instruments to hedge interest rate or foreign exchange risks;
 - e) Units denominated in Euros in money market UCITS, which invest exclusively in assets denominated in Euros or which systematically hedge foreign exchange risk, provided that the investment in UCIs does not exceed 10% of the NAV.
 - f) Money market instruments are eligible for investment by the UCI provided that they meet all of the following requirements:
 - They belong to one of the categories of money market instruments referred to in Article 50(1)(a), (b), (c) or (h), of Directive 2009/65/EC;
 - They have one of the following alternative characteristics:
 - 1) Legal maturity upon issuance equal to or shorter than 397 days;
 - 2) Residual maturity or shorter than 397 days (the UCI may invest in money market instruments with a residual maturity of up to two years, provided that the remaining period up to the next interest rate revision date is equal to or shorter than 397 days).
 - The issuer of the money market instrument and the quality of the money market instrument have received a favourable internal assessment (not applicable to money market instruments issued or guaranteed by the European Union, a central authority or the central bank of a Member State, the European Central Bank, the European Investment Bank, the European Stability Mechanism or the European Financial Stability Fund).
 - g) Money market UCITS subject to investment may not, under the terms of their management regulations or their instruments of incorporation, invest, in total, more than 10% of their assets in units or shares in other UCITS, nor hold units in the acquiring fund.
 - h) The Fund may hold, on an ancillary basis, liquid assets, pursuant to Article 50(2) of Directive 2009/65/EC.

The high quality of the assets that may be included in the UCI's portfolio is determined by the Management Company, through a quantitative and qualitative analysis based on a systematic and continuous assessment of the different factors that are indicative of the solvency capacity and the ability to comply with financial commitments of companies that act as issuers and their financial instruments. So, for each money market instrument, the following criteria are taken into account:

1. Quantification of the issuer's credit risk a;
2. Qualitative and quantitative indicators on the instrument's issuer, including a macroeconomic framework;
3. Nature of the asset class of the money market instruments;
4. The type of issuer;
5. Operational risk and counterparty risk associated with investing in structured financial products and the risk of the underlying assets, if any;
6. Liquidity profile of the money market instrument.

The credit quality of the assets that may be included in the UCI's portfolio and the assessment methodology are reviewed periodically, at least once a year.

The UCI cannot:

- i. Taking direct or indirect exposure to equities or commodities, including via derivatives, certificates that representing them, indices based on them or any other means or instrument that represents an exposure to them;
- ii. Entering into securities lending agreements or securities borrowing agreements or any other agreements that encumber the UCI's assets;

- iii. Borrowing and lending cash.

Derivative Financial Instruments may be used provided that they only serve the purpose of hedging Interest Rate Risk and Foreign Exchange Risk, and that the underlying instrument is interest rates, exchange rates, currencies or indices that represent these categories.

1.2. Markets

With regard to listed assets, the FUND will invest in money market instruments admitted to listing or traded on regulated markets of EU Member States.

Transferable securities and money market instruments can be traded in non-regulated markets, which using settlement systems internationally recognised by financial markets (e.g., Clearstream, Euroclear), ensure liquidity and guarantee the correct and adequate valuation of the securities that are being traded.

1.3. Benchmark

The UCI is not referenced to any money market or capital market index.

1.4. Transaction execution and order transmission policy

- a) When executing transactions on financial instruments on behalf of the FUND, the Management Company shall seek to obtain the best possible execution, adopting all reasonable measures to gauge it considering the price of the financial instrument, the associated transaction costs, the terms, and the probability of execution and settlement or any other relevant factor.
- b) To determine the relative importance or ranking of the relevant factors, the Management Company shall take into account the following criteria: the objectives and characteristics of the transaction, the FUND's investment policy and risk level, the characteristics of the financial instruments involved in the transaction and the characteristics of the venues where the transactions will be carried out.
- c) When transmitting orders to the financial intermediary, the Management Company considers the factors and criteria outlined above, as well as the nature of the financial instrument in question, with the purpose of obtaining the best possible execution for the FUND.
- d) The transaction execution and order transmission policy will be available to Unitholders upon request.

1.5. FUND Investment Limits

- a) The weighted average maturity of the money market UCITS portfolio is equal to or less than six months. The weighted average maturity translates the average residual time up to the maturity of the UCITS' assets, weighted according to their relative weights in the portfolio, considering that, in the case of assets subject to periodic profitability adjustments according to money market conditions, the maturity corresponds to the remaining period of time up to the following periodic adjustment to the profitability of each asset;
- b) The weighted average life of the money market UCITS portfolio is equal to or less than 12 months. The weighted average life reflects the average time to maturity of all the UCI's assets, weighted according to their relative weights in its portfolio. The maturity used for calculating the weighted average life is the residual maturity;
- c) At least 7.5% of the UCI's assets are to be comprised of daily maturing assets, reverse repurchase agreements which can be terminated by giving prior notice of one business day or bank deposits which can be withdrawn by giving prior notice of one business day.
- d) At least 15% of the UCI's assets are to be comprised of weekly maturing assets, reverse repurchase agreements which can be terminated by giving prior notice of five business day or bank deposits which can be withdrawn by giving prior notice of five business days.
- e) For the purposes of the calculation referred to in subparagraph (d), money market instruments or units or shares in other money market UCITS may be included within the weekly maturing assets up to 7,5 % of its assets provided they are able to be redeemed and settled within five business days.
- f) The UCI may acquire the units or shares of any other money market UCITS provided that all of the following conditions are fulfilled:

- i) Money market UCITS subject to investment may not, under the terms of their management regulations or their instruments of incorporation, invest more than 10% of their assets in units or shares in other UCITS;
- ii) Money market UCITS subject to investment may not hold units or shares in the acquiring UCI.

The money market UCITS whose units or shares were acquired may not invest in the acquiring money market UCITS during the period in which the acquiring UCI holds units or shares in that UCI.

- g) The UCI may not invest more than 5% of its assets in units or shares in a single UCI.
- h) The UCI may not invest more than:
 - i) 5% of its assets in money market instruments, securitisations and ABCP (*Asset-Backed Commercial Paper*) issued by the same entity;
 - ii) 10% of its assets in deposits placed with the same credit institution;
 - iii) Without prejudice to the provisions of the above subparagraph, the UCI may invest up to 15% in deposits placed with the same Portuguese credit institution, if, in the view of the Management Company, the number of viable credit institutions operating in Portugal is insufficient to comply with the diversification limit provided for in (ii) and provided that it is not economically viable for the UCI to make deposits in another Member State;
 - iv) In aggregate, 17.5% of its assets in units or shares in other MMFs.
- i) Without prejudice to the provisions of (h), the UCI may invest up to 10% of its assets in money market instruments, securitisations and ABCP issued by the same entity provided that the total value of these money market instruments, securitisations, and ABCP held by the UCI in each issuer entity in which it invests more than 5% of its assets does not exceed 40% of the value of its assets.
- j) The aggregate value of all the UCI's exposures to securitisations and ABCP shall not exceed 20% of UCI's assets, whereby up to 15% of the UCI's assets may be invested in securitisations and ABCP that do not comply with the criteria for the identification of STS securitisations and ABCP.
- k) The aggregate risk exposure to the same counterparty of the UCI stemming from OTC derivative transactions shall not exceed 5% of the UCI's assets.
- l) Notwithstanding the individual limits defined above, the UCI shall not combine, where to do so would result in an investment of more than 20% of its assets in a single entity, any of the following:
 - i) Investments in money market instruments, securitisations, and ABCP issued by that entity;
 - ii) Deposits placed with that entity;
 - iii) Over-the-counter derivative financial instruments that result in an exposure to counterparty risks in relation to that entity.
- m) The UCI may invest up to 100% of its assets in different money market instruments issued or guaranteed individually or jointly by the European Union, the national, regional and local administrations of the Member States or their central banks, the European Central Bank, the European Investment Bank, the European Investment Fund, the European Stability Mechanism, the European Financial Stability Fund, a central authority or the central bank of a third country, the International Monetary Fund, the International Bank for Reconstruction and Development, the Council of Europe Development Bank, the European Bank for Reconstruction and Development, the Bank for International Settlements or any other relevant financial organisation or institution in which one or more Member States belong;
- n) The provisions in (m) shall only apply if the UCI holds money market instruments of at least six different issuances from the issuer and if its investment in money market instruments from the same issue is limited to a maximum of 30% of its assets.

1.6. Special characteristics of the FUND

This is a Money Market UCI, so it can only invest in money market instruments, bank deposits, and money market UCITS units.

This FUND does not offer a fixed or guaranteed remuneration, therefore the investor is exposed to the various risks mentioned below, which may entail a risk of capital loss, i.e., they may not recover their full investment:

- i. **Credit Risk:** The FUND is exposed to credit risk arising from the sensitivity of asset prices to fluctuations in the probability of the issuer of a security being unable to meet its interest and principal payment obligations in due time;
- ii. **Interest Rate Risk:** The FUND is exposed to interest rate risk resulting from changes in the price of fixed rate bonds due to fluctuations in market interest rates;
- iii. **Liquidity Risk:** The FUND may have difficulties in increasing the value or meeting high-volume redemption requests if some of its investments become illiquid or do not permit their sale at fair prices;
- iv. **Counterparty Risk:** The FUND is exposed to Counterparty Risk arising from the possibility of the counterparty in a transaction becoming unable to meet its commitments to deliver the financial instruments or monetary values on the settlement date, forcing the transaction to be concluded at a price different from that agreed;
- v. **Operational Risk:** The FUND is exposed to the risk of losses resulting, in particular, from human error or system failures or incorrect valuation of the underlying securities;
- vi. **Sustainability Risks:** The Fund may be exposed to sustainability risks, being said risks defined as a happening or condition of an environmental, social or governance nature, and if it takes place it may set off an effective or potential negative impact on the value of the investment.

1.7. Sustainability information

In recent years the Management Entity has sought to guide its actions with principles of high social, environmental and economic responsibility, favouring practices that promote the rationalization of resources and sustainable development, in its daily activity and in the investment process of the Funds under its management.

Aware that this is a path that does not represent a financial product made alone, the Management Entity has committed to respect and support the 10 Principles of the United Nations Global Compact, seeking, through participation and sharing of experiences, to align its performance with the best international practices on human rights, labour practices, environmental protection and anti-corruption.

In this sense, the Management Entity has also begun to incorporate environmental, social and governance criteria (ESG factors) in the Funds' investment decision-making processes, together with the traditional financial factors, reinforcing its commitment to the promotion of sustainable development.

The integration of ESG factors into investment decision-making is an ongoing and progressive process, which is currently based on the following components:

- Exclusion (negative screening) of controversial sectors or companies that have most of their revenues dependent on specific businesses, namely Gambling, Controversial Weapons, Tobacco and Thermal Coal;
- Definition of limits and eligibility criteria for investments according to the ESG risk rating of the issuers or issuances, using external ESG Rating Risk providers;
- Analysis of controversies that identify companies involved in ESG incidents that could have a negative impact on stakeholders and the company's own operations. Establishment of limits based on external analysis.
- In the fund selection process, the adoption and implementation of ESG criteria and the integration of sustainability risks, in the funds' investment policies and in the governance of the management entities, is verified.

IMGA has also assumed the commitment to contribute to achieving the 17 Sustainable Development Goals defined in Agenda 2030 and intends in the short term to improve transparency and communication of these issues, with the integration of more economic, social and environmental performance indicators, the disclosure of actions taken, and the evaluation of impacts generated.

a) Integration of sustainability risks

In accordance with the Management Entity's Sustainability Policy, the FUND privileges issuers that adopt best practices in terms of Governance, Human Rights and the Environment, and has tools and procedures in place to integrate sustainability risks into its investment process.

ESG risk factors are integrated into the investment decision-making process through ESG Rating metrics, which identify and monitor this type of risk.

b) Promotion of environmental or social characteristics

The Fund adopts a commitment to enhance the promotion of environmental and social characteristics by increasing its level of investment in issuers or issuances that hold a minimum ESG rating, with the overall goal of an improvement in the Fund's ESG rating level.

ESG criteria in the investment decision-making process are incorporated along with traditional financial criteria.

In this regard, the Fund seeks the promotion of environmental and social characteristics within the meaning of Article 8 of the Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector.

As regards the use of the criteria for environmentally sustainable economic activities to determine the environmental sustainability of the investments made by the Fund, pursuant to Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation), and as there is not yet sufficient issuer-specific data to calculate the appropriate degree of alignment of investments to the established criteria, the Fund does not yet use the technical assessment criteria stipulated by that Regulation. However, in the pursuit of promoting the environmental and social features implicit in the Fund's investment policy, the Management Company uses external ESG assessment sources to define limits and eligibility criteria for investments according to the ESG risk of the issuers and issuances.

c) Assessment of potential adverse impacts on sustainability

The Management Entity analyses and assesses potential adverse impacts in the investment decision-making process through the incorporation of ESG risk factors, and in the ongoing analysis and monitoring of the issuers or issuances that constitute the Fund's portfolio.

The process of analysis and measurement of potential impacts is an evolving process, dependent on the availability of information from third parties, and the Management Entity will make its best efforts for its adequate integration and assessment.

2. Derivative Financial Instruments, Repos, and Loans

The UCI may use derivative financial instruments if they are traded on one of the regulated markets referred to in Article 50(1)(a), (b) or (c) of Directive 2009/65/EC or on the over-the-counter market and if they cumulatively meet the following conditions:

- a) The underlying asset of the derivative financial instrument consists of interest rates, exchange rates, currencies or indexes that represent one of these categories;
- b) The purpose of the derivative instrument is to hedge interest rate or exchange rate risks inherent to other UCI investments;
- c) The counterparties to OTC derivative transactions are institutions subject to prudential regulation and supervision and belong to the categories approved by the CMVM;
- d) Over-the-counter derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, settled or closed by an offsetting transaction at any time and at their fair value on the initiative of the UCI.

- e) The Management Company does not intend to carry out loan and repo transactions on behalf of the FUND.
- f) If the FUND is unable to carry out its risk assessment based on the commitment-based approach, the Management Company may adopt a different approach, namely the VaR-based approach.

3. Assets' valuation

3.1. Moment of reference for valuation

- a) The unit value is calculated daily, on business days, simultaneously determining the unit values for Unit Class A, Unit Class R and Unit Class I by dividing the FUND's net asset value by the number of circulating units.
- b) The value of a Unit Class A unit is determined by dividing the net asset value of the FUND allocated to this Unit Class by the number of Unit Class A units in circulation.
- c) The value of a Unit Class I unit is determined by dividing the net asset value of the FUND allocated to this Unit Class by the number of Unit Class I units in circulation.
- d) The value of a Unit Class R unit is determined by dividing the net asset value of the FUND allocated to this Unit Class by the number of Unit Class R units in circulation.
- e) The net asset value of the FUND assigned to each Unit class is determined by deducting from the sum of the values that comprise it, the amount of fees and charges incurred up to the valuation of the portfolio, respective to each Unit class.
- f) The value of the units will be calculated at 5:00 p.m. in mainland Portugal, which is the reference time for the calculation.
- g) Assets denominated in foreign currencies will be valued daily using the indicative exchange rate published by Banco de Portugal and by the European Central Bank, except for unlisted currencies. In this case, the exchange rates disclosed at 12 p.m. (mainland Portugal time) by specialised entities that are not in a controlling or group relationship with the Management Company, pursuant to Articles 20 and 21 of the Portuguese Securities Code, shall apply.

3.2. Valuation rules and calculation of the unit value

- a) All transactions in transferable securities and derivative financial instruments traded for the FUND and confirmed up to the reference moment are taken into account for unit valuation purposes on the transaction day. All subscriptions and redemptions received on any given day (referring to requests submitted on the previous business day) are taken into account for unit valuation purposes on that same day.
- b) The valuation of transferable securities and derivative financial instruments is carried out, at least, every day.
- c) Where possible, the UCI's assets are valued based on a regulated market price.
- d) When the regulated market price is used:
 - i. The UCI's asset is valued at the most prudent bid or ask price, unless it is possible to close the position in the asset at the mid-market price;
 - ii. Only good quality data can be used; such data are assessed based on the following cumulative elements:
 - The number and quality of the counterparties;
 - The sales volume and the turnover of the MMF's asset in the market;
 - The size of the issue and the proportion of the issue that the MMF plans to buy or sell.
- e) If it is not possible to use the regulated market price or if the data are not good enough, the UCI's asset is valued prudently, using a valuation based on a model. The model should correctly estimate the intrinsic value of the UCI's asset, based on the following cumulative updated key factors:
 - The sales volume and the turnover of that asset in the market;
 - The size of the issue and the proportion of the issue that the UCI plans to buy or sell;
 - The market risk, interest rate risk and credit risk associated with the asset.
- f) By way of derogation from the provisions of subparagraph (c), units from Collective Investment Undertakings are valued at the last value disclosed to the market by the corresponding Management Company, provided that the disclosure does not occur later than 3 months from the reference date;

4. Exercising voting rights

- a) As a policy, the Management Company will take part in the general meetings of the companies, based in Portugal or abroad, in which it has a qualified holding, considering all the funds under management. In all other cases, participation in meetings will depend on the relevance of the items on the agenda and the assessment of the acts in which it is called on to participate.
- b) Votes shall be cast according to the specific circumstances and the available information in order to best defend the interests of the Unitholders.
- c) However, the Management Company takes as its rule that it shall not exercise its voting rights to support the inclusion or the maintenance of statutory clauses aimed at preventing the transferability or limiting voting rights nor with the main purpose of strengthening the corporate influence of an entity with which it has a controlling or group relationship.
- d) Any position that deviates from the rule shall be duly substantiated in the minutes of a meeting held by the Board of Directors of the Management Company.
- e) With regard to the means of exercising its voting rights, the Management Company shall choose, as a rule, to exercise them directly, being represented by a director or by an employee duly accredited for this purpose; however, it will also be allowed to exercise them indirectly, through a third party that may be authorised to act as its representative, which, while being able to represent other entities, cannot represent entities that have a controlling or group relationship with the Management Company. If its voting rights are exercised by a representative, they shall be bound to vote according to the written instructions issued by the Board of Directors of the Management Company.
- f) If any of the duties related to the management of undertakings for collective investment are subcontracted, voting rights shall be exercised in accordance with the above paragraphs.

5. Ongoing Charges

Unit Class A

Charges Attributed to the FUND in 2022	Value (Eur)	% NAV (1)
Management Fee*	139,245	0.05%
Deposit Fee*	55,698	0.02%
Supervision Fee	21,924	0.01%
Audit Costs	4,664	0.00%
Stamp duty on the value of the UCI	27,629	0.01%
Other current charges	176,700	0.07%
Other UCI charges	0	0.00%
Total	425,860	
Ongoing Charges (%NAV)		0.16%

(1) Average for the reference period

*The value includes stamp duty according to the current rate during the referred period

Unit Class R

Charges Attributed to the FUND in 2022	Value (Eur)	% NAV (1)
Management Fee*	2,140	0.05%
Deposit Fee*	856	0.02%
Supervision Fee	337	0.01%
Audit Costs	72	0.00%
Stamp duty on the value of the UCI	425	0.01%
Other current charges	2,715	0.07%
Other UCI charges	0	0.00%
Total	6,545	

Ongoing Charges (%NAV)	0.16%
(1) Average for the reference period	
*The value includes stamp duty according to the current rate during the referred period	

Unit Class I

Charges Attributed to the FUND in 2022	Value (Eur)	% NAV (1)
Management Fee*	321	0.02%
Deposit Fee*	256	0.02%
Supervision Fee	114	0.01%
Audit Costs	24	0.00%
Stamp duty on the value of the UCI	127	0.01%
Other current charges	939	0.07%
Other UCI charges	0	0.00%
Total	1,782	
Ongoing Charges (%NAV)		0.13%

(1) Average for the reference period

*The value includes stamp duty according to the current rate during the referred period

Ongoing Charges (Unit Class A) *	0.63%
---	-------

Ongoing Charges (Unit Class R) *	0.63%
---	-------

Ongoing Charges (Unit Class I) *	0.16%
---	-------

* The Ongoing Charges represent an estimate of the charges that the FUND would bear over a year and takes into account the management fee mentioned in chapter 6.

The FUND's annual report for each financial year will include detailed information on the exact charges that are levied. Their value may vary from year to year. It excludes, namely:

- Performance Fee;
- Transaction costs, except in the case of subscription/redemption charges attributed to the fund upon the subscription/redemption of another fund's unit.

6. Current Charges Table

Charges directly attributable to the FUND	
Management Fee (Unit Class A) (**) (***)	0.5%/year
Management Fee (Unit Class R) (**) (***)	0.5%/year
Management Fee (Unit Class I) (**)	0.05%/year
Deposit Fee (**)	0.02%/year
Supervision Fee	0.0067%/month
Stamp duty on the value of the UCI	0.0025%/year
Other costs (***) : charges associated with the investment and disinvestment of the FUND, audit costs, taxes, interest and bank fees.	

*Stamp Duty at the rate in force shall apply to the Management and Deposit Fees.

** The Management Fee for Unit Classes A and R are partially intended to remunerate the services provided by the Distributors, and the indicated amount is shared among the Management Company and each of the Distributors, in accordance with the provisions of paragraph 7.1 of this chapter.

***The FUND may incur in other expenses and charges, properly documented, derive from the fulfilment of legal duties, other than those identified.

Charges directly attributable to the Unitholder (Unit Classes A, R and I)	
Entry Charges	0%
Exist Charges	0%

7. Fees and charges to be applied to the FUND

7.1. Management Fee

Without prejudice to other rights granted to it by law or by this Prospectus, the Management Company is entitled to charge a Management Fee:

- For Unit Class A, of 0.50% a year
- For Unit Class R, of 0.50% a year
- For Unit Class I, of 0.05% per year,

charged monthly and in arrears, calculated daily on the net asset value of Unit Class A, Unit Class R and Unit Class I, respectively, before commissions, to be applied to the respective Unit Classes and intended to cover all management expenses. Stamp Duty at the rate in force shall apply to the Management Fee.

For Unit Class A, between November 1st 2015 and November 1st 2017 the management fee was 0.3% per year; between January 1st 2017 and March 31st 2017 the management fee was reduced to 0.25% per year, between April 1st 2017 and February 28th 2019 the management fee was reduced to 0.20% per year, between March 1st 2019 and December 31st 2019 the management fee was reduced to 0.10% per year, and between January 1st 2020 and December 31th 2022 the management fee was reduced to 0.05% per year.

For Unit Class R, between April 1st 2021 and December 31th 2022, the management fee is of 0.05% per year.

For Unit Class I, between January 1st 2022 and December 31th 2022, the management fee is of 0.025% per year.

The Management Fee for Unit Class A is partially intended to remunerate the services provided by the Distributors and is shared among the Management Company and each of the Distributors as follows:

- an amount equivalent to 65% of the FUND's Management Fee, in force at each moment, shall be assigned to remunerate the services provided by Banco Comercial Português (in force as of February 1st, 2021);
- an amount equivalent to 65% of the FUND's Management Fee, in force at each moment, shall be assigned to remunerate the services provided by ActivoBank (in force as of February 1st, 2021);

The Management Fee for Unit Class R is partially intended to remunerate the services provided by some Distributors and is shared among the Management Company and each of the Distributors as follows:

- an amount equivalent to 50% of the FUND's Management Fee, in force at each moment, shall be assigned to remunerate the services provided by Bison Bank;
- an amount equivalent to 50% of the FUND's Management Fee, in force at each moment, shall be assigned to remunerate the services provided by Banco Invest;
- an amount equivalent to 50% of the Management Fee of the FUND, in force at each moment, shall be assigned to remunerate the services provided by Banco BEST.

These amounts shall be charged monthly and in arrears, calculated daily on the net asset value of Unit class A and Unit class R, respectively, before fees, weighted by the volume of units marketed by each of the Distributors.

The Management Entity reserves the right to, in circumstances it deems exceptional, temporarily reduce the Management Fee, thereby reducing, albeit temporarily, the revenue earned from the management of the FUND. Exceptional circumstances include, among others, those resulting from unfavourable market conditions, which have a negative impact on Unitholders. With these reductions, the Management Entity chooses to voluntarily share the negative impacts that these unfavourable market conditions impose on Unitholders. The Management Entity will disclose, at each moment, in the FUND's Prospectus and KII, the fee amounts charged, as well as the period during which any reductions will be in force. Stamp Duty at the rate in force shall apply to the Management Fee.

7.2. Deposit fee

Without prejudice to other rights granted to it by law or by this Prospectus, the Depositary is entitled to charge to the FUND, for its services, a fee of 0.02% per annum, charged monthly and in arrears, calculated

daily on the net asset value of the FUND, before fees. Stamp Duty at the current rate shall apply to the Deposit Fee.

7.3. Other charges

In addition to the Management and Deposit Fees, the FUND will also bear all expenses arising from the purchase and sale of securities, acquisition, redemption or transfer of units of other CIUs, management fees charged by owned CIUs, bank accounts maintenance fees and other costs and bank fees including costs for issuing bank balance statements to the auditors.

The FUND may incur in other expenses and charges, as long as they are properly documented, derive from the fulfilment of legal duties, as for example the costs of issuing and renewing LEI codes or other legal and tax charges or expenses related to the use of derivatives.

The FUND shall also be charged a monthly Supervision Fee of 0.067 ‰ by the Portuguese Securities Market Commission, and the mark-up fee applied, and all mandatory audit costs.

The remuneration of the subcontracted entity will be paid by the Management Company and will not be charged to either the FUND or the Unitholders.

Should IMGA resort to investment studies (research) to manage the Fund, these shall be applied to the Management Company.

8. Income distribution policy

The FUND's income will not be distributed, being capitalised and invested in accordance with the corresponding investment policy.

Chapter III - Units and Conditions for Subscription, Transfer, and Redemption

1. General Characteristics of the Units

1.1. Definition

The FUND is an open-ended undertaking for collective investment whose assets are represented by shares of the same content, with no par value, known as units, which guarantee equal rights to the Unitholders.

1.2. Form of representation

Units are registered and take on a book entry form. For transaction purposes, the units may be divided up to the fourth decimal place.

1.3. Unit Classes

The FUND issues units under three different Unit Classes:

Unit Class A: The minimum subscription amount is EUR 250; there are no limits on subsequent subscriptions; the Management Fee paid by Unitholders is that mentioned in item 7.1 of chapter II.

Unit Class R: The minimum subscription amount is EUR 500; there are no limits on subsequent subscriptions; the Management Fee paid by Unitholders is that mentioned in item 7.1 of chapter II.

Unit Class I: The minimum subscription amount is EUR 500,000; there are no limits on subsequent subscriptions; the Management Fee paid by Unitholders is that mentioned in item 7.1 of chapter II.

2. Unit value

2.1. Initial value

When the FUND was established, the unit value for Unit Class A was EUR 5,000. Regarding the establishment of Unit Classes I and R, their initial unit values are EUR 5.

2.2. Value for subscription purposes

The unit value for subscription purposes is the unit value that will be determined at the end of the day on which the request is submitted, so it is made at an unknown price.

2.3. Value for redemption purposes

The unit value for redemption purposes is the unit value that will be determined at the end of the day on which the request is submitted, so it is made at an unknown price.

3. Subscription and redemption conditions**3.1. Subscription and redemption periods**

On a daily basis, subscriptions and redemptions of the FUND via any of the distribution channels managed by any of the following distributors, in order to be processed on the corresponding day must be placed until:

Distributor	Hour Limit (Mainland Portugal Time)
Banco Comercial Português, S.A.	5 p.m.
Banco ActivoBank, S.A.	5 p.m.
Bison Bank, S.A.	4 p.m.
Banco Invest, S.A.	3:30 p.m.
IMGA, SGOIC., S.A.	3:30 p.m.
BEST, S.A.	3 p.m.
Banco BNI Europa S.A.	3:30 p.m.

All requests received outside the aforementioned business hours shall be considered as submitted on the business day following that of the request.

3.2. Subscriptions and redemptions in kind or cash

Subscriptions and redemptions are always made in cash.

4. Subscription conditions**4.1. Minimum Subscription**

In the case of Unit Class A, the minimum subscription amount is EUR 250, with no minimum amounts on subsequent subscriptions.

For Unit Class I, it is possible to obtain the status of Unitholder by means of a single initial investment in the minimum amount of EUR 500,000, with no limits on subsequent subscriptions.

For Unit Class R it is possible to obtain the status of Unitholder by means of a single initial investment in the minimum amount of EUR 500, with no limits on subsequent subscriptions.

4.2. Entry charges (Unit Classes A, R and I)

No entry charges will be levied.

4.3. Effective subscription date

The subscription amount will be debited from an account held with the Distributor, on the first business day following that on which the subscription request is submitted.

The unit will only be issued once the amount corresponding to the issue price is integrated into the FUND's assets.

5. Redemption conditions**5.1. Exit charges (Unit Classes A, R and I)**

No exit charges will be levied.

5.2. Notice

The redemption request will be settled at the amount corresponding to the value calculated in the first valuation subsequent to the request and paid by crediting the Unitholders' account within 1 business day from the request date (this period already includes the account credit date for this type of transactions).

5.3. Transfer Conditions

Not applicable

6. Suspending unit subscriptions and redemptions

The suspension of subscriptions and redemptions is governed by the law and, in particular, by the following provisions:

- a) Once the net assets held by the FUND and the indebtedness possibilities have been exhausted, under the provisions laid down by law and regulations, when unit redemption request exceed, for a period of no more than five days, 10% of the overall value of the FUND, the Management Company may order the suspension of all redemption transactions;
- b) Suspending redemption does not determine the simultaneous suspension of the subscription, which can only occur once the unit-holder states, in writing, that they have become aware of the redemption suspension;
- c) With the Depositary's consent, the Management Company may also suspend the subscription or redemption of units under other exceptional circumstances.
- d) The decision taken under the provisions of subparagraphs a) and c) is immediately communicated to the CMVM, indicating:
 - i. The exceptional circumstances in question;
 - ii. The extent to which the interest of the Unitholders justifies it; and
 - iii. The expected duration of the suspension and its grounds.
- e) Following a suspension under the above subparagraphs, the Management Company shall immediately release a notice to all the locations and means used for distributing and disclosing the value of the units, indicating the reasons for the suspension and its duration;
- f) The CMVM may determine, within two days of receipt of the communication referred to in subparagraph (d), the period applicable to the suspension if it disagrees with the Management Company's decision.
- g) Without prejudice to the provisions of the following subparagraph, the suspension of subscriptions or redemptions shall not cover requests submitted by the end of the day before the decision was taken.
- h) The subscription or redemption of FUND units may also be suspended by decision of the CMVM, in the interest of the Unitholders or in the public interest, effective immediately and applicable to all the subscription and redemption requests that have not been fulfilled when the CMVM notifies the Management Company.
- i) The provisions of subparagraph (e) shall apply, mutatis mutandis, to the suspensions determined by the CMVM.

7. Admission to trading

The FUND's units are not expected to be admitted to trading.

Chapter IV – Rights and Obligations of the Unitholders

- a) Without prejudice to other rights granted to them by law or by this Prospectus, Unitholders have the following rights:
 - i. Obtain free of charge, with sufficient notice in relation to the subscription, the document with the Key Investor Information (KII), regardless of the FUND's distribution method;
 - ii. To be provided, by the Management Company and the Distributors, on a durable medium or through a website, and regardless of the FUND's distribution method, the Prospectus and the annual and half-yearly reports and accounts, which will be provided, free of charge, on paper, to Unitholders who request it;
 - iii. To subscribe and redeem units in accordance with the law and the FUND's instruments of incorporation;
 - iv. To redeem units without paying the corresponding fee until the applicable conditions come into force, in the event of an overall increase in the Management and Deposit Fees applied to the FUND or of a significant change in the investment policy or the income distribution policy;
 - v. To register units in an individual account, after paying the subscription amount in full, within the deadline provided for in the undertaking for collective investment's instruments of incorporation;

- vi. To receive the amount corresponding to the value of the redemption or the proceeds of the liquidation of the units;
 - vii. To register units in an individual account, after paying the subscription amount in full, within the deadline provided for in the undertaking for collective investment's instruments of incorporation;
 - viii. To be reimbursed by the Management Company for any losses suffered, without prejudice to the exercise of the right to compensation recognised under the general terms of law, whenever:
 - I. The following conditions are cumulatively met as a result of errors attributable to the Management Company occurred in the process of valuing and disclosing the value of the unit,
 - the difference between the amount that should have been calculated and the value that was actually used for subscriptions or redemptions is, in accumulated terms, equal to or higher than 0.5%;
 - the loss suffered, per Unit-holder, exceeds 5 Euros.
 - II. there are errors in the allocation of subscriptions and redemptions to the FUND's assets, namely due to their untimely processing.
- b) Without prejudice to other obligations that may be conferred upon them by law, upon subscription, Unitholders mandate the Management Company to carry out the necessary acts for managing the FUND, accepting the conditions set out in the FUND's instruments of incorporation.

Chapter V - The Liquidation Conditions of the FUND

- a) When the interests of the Unitholders recommend it, the Management Company may proceed with the liquidation and sharing of the FUND by notifying the CMVM and each Unit-holder individually, and by disclosing that information to all the locations and means used for distribution purposes and in the CMVM's Information Disclosure System, indicating the estimated deadline for completing the process.
- b) A liquidation decision shall determine the immediate suspension of all FUND subscriptions and redemptions.
- c) The liquidation period shall be 5 business days, plus the time limit for the payment of the request for redemption.
- d) Unitholders may not require the liquidation or sharing of the FUND.

Part II - Additional information applicable to open-ended UCI

Chapter I - Other information on the Management Company and Other Entities

1. Other Information on the Management Company

1.1. Governing Bodies

Board of the General Meeting

Chairman: Javier de la Parte Rodriguez
 Secretary: João Rui Rodrigues Duarte Grilo

Board of Directors

Chairman: Iñigo Trincado Boville
 Vice chairman: Emanuel Guilherme Louro da Silva
 Members: Mário Dúlio de Oliveira Negrão
 Ana Rita Soares de Oliveira Gomes Viana
 João Pedro Guimarães Gonçalves Pereira

Supervisory Board

Chairman: José Pinhão Rodrigues
 Members: Isabel Maria Estima da Costa Lourenço
 António Joaquim dos Santos Lindeza

Alternate Member: Afonso Miguel Pereira de Castro Chito Rodrigues

Main functions performed by the members of the Governing Body outside the Management Company**Iñigo Trincado Boville**

Corretaje e Información Monetaria y de Divisas, S.A. (CIMD, S.A.) – Chairman of the Board of Directors
Corretaje e Información Monetaria y de Divisas, S.V., S.A. (CIMD, S.V., S.A.) – Director (non-executive)
Intermoney Titulización, SGFT, S.A. – Director (non-executive)
Intermoney Gestión, S.G.I.I.C., S.A. – Chairman of the Board of Directors (non-executive)

Emanuel Guilherme Louro da Silva

Intermoney Valores, S.V., S.A. – Vice-chairman of the Board of Directors (non-executive)

Mário Dúlio de Oliveira Negrão

Nexponor SICAFI – Member of the Board of Directors (non-executive)

Ana Rita Soares de Oliveira Gomes Viana

Does not perform other functions.

João Pedro Guimarães Gonçalves Pereira

Managing Partner at Attributequation, Lda

1.2. Group Relationship with other entities

There are no group relations with the other entities involved in the activity to the FUND.

1.3. Other funds managed by the Management Company

In addition to the FUND to which this instrument of incorporation refers, the Management Company also manages other funds listed in the Annex to this Prospectus.

1.4. Please use the following contacts if you have any doubts regarding the FUND

Telephone: +351 211 209 100

E-mail: imgainfo@imga.pt
imga_apoioclientes@imga.pt

Internet: www.imga.pt

2. External Investment Advisors

The Management Company does not use the services of external investment advisors for the management of the FUND.

3. FUND Auditor

The FUND 's accounts are closed on December 31st of each year and are legally certified by Mazars & Associados, S.R.O.C., S.A., headquartered at Rua Tomás da Fonseca, torre G – 5º, 1600-209 Lisboa, Telephone +351 217 210 180.

4. FUND Supervisory Authority

The FUND is under the supervision of CMVM – Comissão do Mercado de Valores Mobiliários, Telephone +351 213 177 000.

5. Remuneration Policy

1. The Company has a solid corporate governance, whereby various its internal structures have an active role in the preparation of the various remuneration policies and practices, in accordance with numbers 4, 5 and 6 below;
2. In addition, the Company has systems in place to adjust the variable remuneration, in view of possible changes in risk, so that IMGA's risk profile cannot be materially altered;
3. Remuneration policies and practices do not endanger the sustainability of the Company and the CIMD Group;

4. The general principles of the Remuneration Policy are reviewed by the Supervisory Board. After hearing the Remuneration Committee, the Supervisory Board submits a proposal to the General Assembly regarding the general principles of the Remuneration Policy. The implementation and monitoring of the general principles of the Remuneration Policy is also the responsibility of the Supervisory Board;
5. The general principles of the Remuneration Policy to be applied to the Recipients is approved by the General Assembly;
6. IMGA's Remuneration Policy obeys the principles of market adequacy, solidarity, correct management of conflicts of interest, proportionality, prohibition of the use of hedging mechanisms, as well as the observation of sustainability/ESG risks.

Details of the updated remuneration policy are available on the website www.imga.pt, and a paper copy will be provided free of charge to investors who request it.

Chapter II – Disclosing Information

1. Unit Value

The Management Company discloses the daily value of the units at its facilities, to anyone who may request it, and also at the branches and via websites and telephone banking services of the Distributors.

The value of the FUND's unit will also be published daily in the CMVM's Information Disclosure System (www.cmvm.pt). This information will always be disclosed on the business day following the reference day used for calculating the unit value.

2. Portfolio Details

In accordance with the rules issued by the Portuguese Securities Market Commission, the detailed portfolio composition of the FUND, its net asset value and the number of units in circulation will be published quarterly through the CMVM's Information Disclosure System (www.cmvm.pt) by the Management Company.

3. Documentation

All documentation regarding the FUND may be requested from the Distributors.

Every year, the Management Company will publish a notice in the CMVM's Information Disclosure System (www.cmvm.pt), stating that the FUND's Annual and Semi-Annual Reports are publicly available for Unitholders and that they will be sent, free of charge, to Unitholders who request them.

Weekly information: A factsheet on the Fund will be published weekly on the website www.imga.pt, which will include information on the portfolio structure by maturity, the credit profile of the FUND's assets, the weighted average maturity, the Fund's weighted average life and the FUND's 10 largest investments.

4. Reports and Accounts

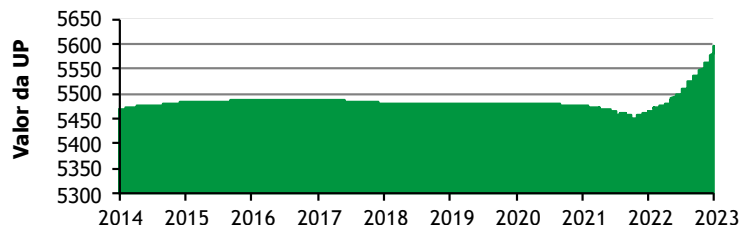
The FUND will close its accounts on December 31st of each year, and within four months from that date, a notice will be published on CMVM's Information Disclosure System (www.cmvm.pt) informing that the documents included in the FUND's Report and Accounts are available to the public at all distribution locations. Half-yearly accounts will be closed on June 30th of each year, and within two months from that date, a notice will be published on CMVM's Information Disclosure System (www.cmvm.pt) informing that the documents included in the FUND'S Report and Accounts are available to the public at all distribution locations.

The FUND'S accounts and related documents are prepared in accordance with generally accepted and applied international accounting standards and all applicable regulations issued by the Portuguese Securities Market Commission .

Chapter III - FUND's Historical Performance

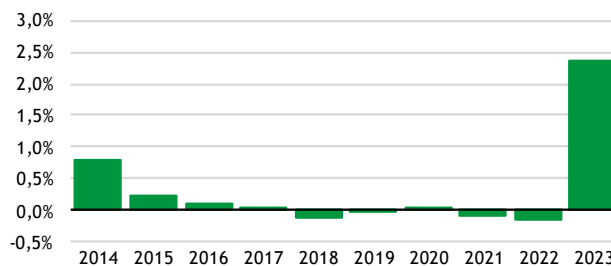
Class A

Unit value performance (Last 10 Calendar Years)



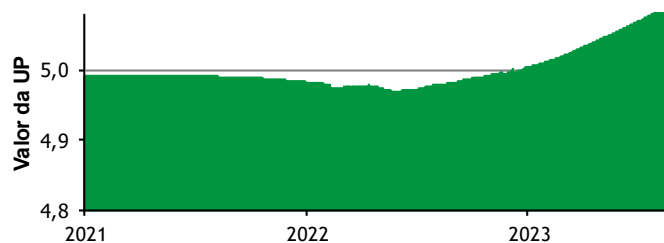
Historical Profitability and Risk (Last 10 Calendar Years)

	Profitability	Risk (level)
2014	0,78%	1
2015	0,23%	1
2016	0,08%	1
2017	0,01%	1
2018	-0,12%	1
2019	-0,03%	1
2020	0,01%	1
2021	-0,09%	1
2022	-0,17%	1
2023	2,37%	1



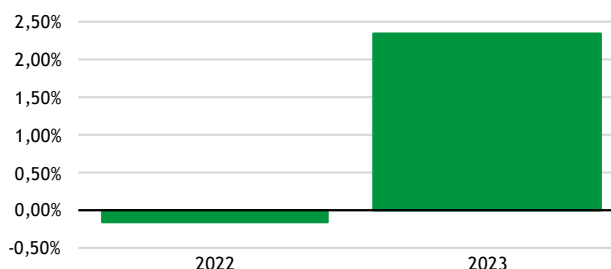
Class R

Evolution of the Unit value (since the beginning of the category activity)



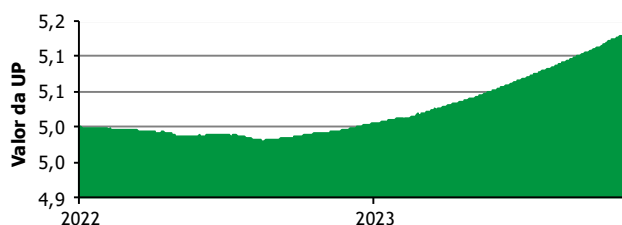
Historical Profitability and Risk (since the beginning of the category's activity)

	Profitability	Risk (level)
2022	-0,17%	1
2023	2,33%	1



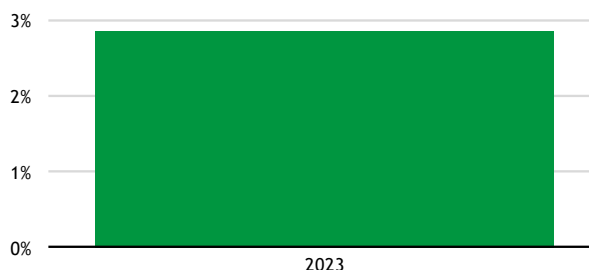
Class I

Evolution of the Unit value (since the beginning of the category activity)



Historical Profitability and Risk (since the beginning of the category's activity)

	Profitability	Risk (level)
2023	2,85%	1



*The Fund changed its investment policy on July 31st, 2019, so the figures disclosed up to that date have been obtained in circumstances that no longer apply.

The profitability disclosed herein represent past data and are not a guarantee of future profitability.

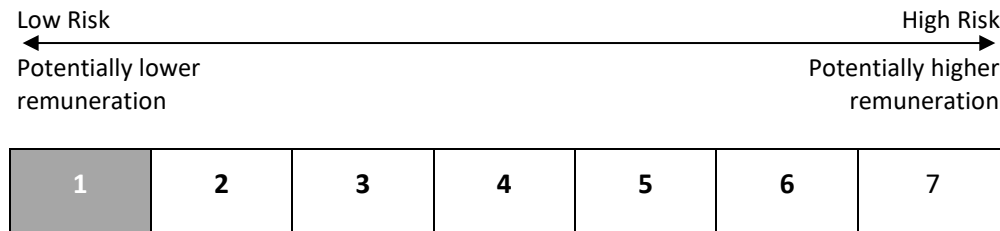
The risk levels disclosed herein represent past data and may increase or decrease in the future according to a rating scale that ranges between 1 (minimum risk) and 7 (maximum risk).

No data is disclosed for Unit classes I due to them not having yet completed a full calendar year.

The disclosed values:

- do not take any Subscription or Redemption Fees that may be due;
- are deducted from taxes applied to the fund until 30/06/2015, applicable to the A Class;
- do not take any taxes that may be due by Unitholders, regarding income earned between 01/07/2015 and the time of redemption, into account.

Synthetic Risk and Reward Indicator



Historical data used for calculation may not be a reliable indication of the future risk profile of the FUND.

The indicator value is distinct from the risk indicator value presented in the key information documents as a result of the use of different calculation methodologies, under the terms of the applicable legislation.

The risk category shown above is not guaranteed to remain unchanged and may vary over time. The lowest risk category does not mean that the investment is risk-free.

The FUND's rating reflects the fact that it is mostly invested in bank deposits, short term public debt securities and fixed rate bonds with a residual maturity under 12 months and, as such, is inherently exposed to Interest Rate Risk. It will tend to be low, due to the issuer's credit quality and the short-term of the securities in the portfolio.

Chapter IV - Target Investor Profile

The FUND is adequate for investors with a conservative risk profile who seek a return higher than the traditional term deposit and without immediate liquidity needs since the FUND's asset structure advises on minimum investment term of 90 days.

Unit Classes A and R are meant for non-professional investors, professionals and eligible counterparties.

Unit Class I is exclusively meant for professional investors and eligible counterparties.

Chapter V - Tax Regime

1. FUND-Related Taxation

- **Corporate Income Tax ('IRC')**

The FUND is taxed at the general rate of Corporate Income Tax (21% in 2015) on its taxable profit, which corresponds to the net income for the year, net of income (and expenses) from capital, property and capital gains obtained, as well as of income, including discounts, and expenses related to management fees and other fees it charges.

Capital gains on assets acquired before July 1st, 2015, are taxed under the regime in force until June 30th 2015, considering, for this purpose, the market value of June 30th 2015.

The FUND is also subject to the autonomous corporate income tax rates in force but is exempt from any state or municipal surcharges.

Additionally, it is possible to deduct tax losses from taxable profits, if any, from one or more of the following 5 tax periods. The deduction made in each tax period cannot exceed 70% of the corresponding taxable profit.

- **Stamp Duty**

Stamp Duty on the FUND's overall net assets is due quarterly at the rate of 0.0025%.

2. Unitholders Related Taxation

Regarding the taxation of Unitholders, the applicable tax regime is based on an 'outgoing taxation' logic.

Taxation, under the new regime, applies only to the portion of income generated from July 1st, 2015, onwards. Thus, the value determined upon the redemption or onerous transfer of the Unit corresponds to the difference between the sale/redemption value and the unit acquisition/subscription value, except for units acquired/subscribed before July 1st 2015, in which case the value determined upon the redemption or onerous transfer of the unit corresponds to the difference between the realisable value and the unit value that reflects market prices at June 30th 2015 or the acquisition/subscription value, if it was higher.

2.1. Natural persons

- **Residents**

Income obtained outside the scope of a commercial, industrial or agricultural activity

Income distributed by the FUND and income from the redemption of units which represent capital gains are subject to a 28 % withholding tax, and the Unitholder may choose to include it.

Income from the onerous transfer of units is subject to a 28% autonomous tax on the positive difference between capital gains and capital losses for the tax period, and the Unitholder may choose to aggregate it.

Income obtained within the scope of a commercial, industrial or agricultural activity

Income distributed by the FUND is subject to a 28 % withholding tax, collected as payment on account of the final amount of tax payable.

Income from the redemption or onerous transfer of units contributes to taxable profit, subject to the general rules of the Corporate Income Tax (IRC) Code and the Personal Income Tax (IRS) Code.

- **Non-residents**

Any income obtained is exempt from Corporate Income Tax (IRS).

When the holders are natural persons resident in a country, territory or region subject to a tax regime that is clearly more favourable, included in the list approved by a decree order of the member of the Government responsible for the area of finance, any income distributed or arising from the redemption of units is subject to a final 35% withholding tax.

When income is paid or made available in accounts opened in the name of one or more holders but on behalf of unidentified third parties, and unless the beneficial owner is identified, said income is subject to a final 35% withholding tax.

Income arising from the onerous transfer of units is subject to a 28% autonomous tax.

2.2. Legal persons

- **Residents**

Income distributed by the FUND is subject to a 25% withholding tax rate, collected as payment on account.

On the other hand, income from the redemption or onerous transfer of units contributes to taxable profit, pursuant to the Corporate Income Tax (IRC) Code.

Income obtained by legal persons exempt from IRC is exempt from IRC, except when earned by legal persons that benefit from partial exemption and that refer to capital income, in which case the income that is distributed is subject to a final 25% withholding tax.

- **Non-Residents**

Income from units is exempt from Corporate Income Tax (IRC).

When the holders are legal persons resident in a country, territory or region subject to a tax regime that is clearly more favourable, included in the list approved by an order of the member of the Government responsible for the area of finance, any income distributed or arising from the redemption of units is subject to a final 35% withholding tax.

When income is paid or made available in accounts opened in the name of one or more holders but on behalf of unidentified third parties, and unless the beneficial owner is identified, said income is subject to a final 35% withholding tax.

Income arising from the onerous transfer of units is subject to a 25% autonomous tax.

In the case of non-resident legal persons that are held, directly or indirectly, in more than 25% by entities or natural persons resident in Portuguese territory, except when that entity is resident in another EU Member State, in a member state of the European Economic Area which is bound to administrative cooperation in the field of taxation equivalent to that established within the EU, or in a State with which an agreement to avoid double taxation providing for the exchange of information has been concluded and is in force, income arising from units is subject to a 25% withholding tax.

Disclaimer: The description of the tax regime provided above, applicable to the FUND and its Unitholders, does not replace the necessary knowledge and reading of legislation in force on the matter nor does it constitute a guarantee that such information will remain unchanged.

Annex 1 - Funds Managed by the Management Company on December 31st 2023

Investment Fund	Type	Investment Policy	AUMs	Nº Unitholders	
CA Monetário			59 658 915	3 553	
IMGA Money Market	(UC A)	Invests in money market instruments and bank deposits.	672 884 880	15 307	
	(UC R)		974 222	14	
	(UC I)		10 825 106	2	
IMGA Money Market USD	(UC A)		Invests in money market instruments and bank deposits. The reference currency is the USD.	14 268 455	276
CA Rendimento		Invests a minimum of 80% of its net asset value in transferable securities representative of floating-rate debt and a maximum of 30% of its net asset value in fixed-rate securities with residual maturities greater than 12 months.	117 196 219	6 535	
IMGA Financial Bonds 3Y 2,25% SERIE I	(UC A)	Invests a minimum of 80% of its net asset value in bonds. Fixed-term fund with maturity at of 31 January 2026.	189 553 628	5 984	
IMGA Financial Bonds 31/2 Y	(UC A)	Invests a minimum of 80% of its net asset value in bonds. Fixed-term fund with maturity at of 30 November 2026.	5 247 369	116	
IMGA Obrigações Globais Euro 2024 – 1ª Série	(UC A)	Invests a minimum of 80% of its net asset value in bonds. Fixed-term fund with maturity at of 31 December 2024.	34 909 886	727	
IMGA Obrigações Globais Euro 2025 – 2ª Série	(UC A)	Invests a minimum of 80% of its net asset value in bonds. Fixed-term fund with maturity at of 15 May 2025.	13 565 572	300	
IMGA Ações Portugal	(UC A)	Invests a minimum of 85% of its net asset value in equity primarily of domestic companies listed on Euronext Lisbon and companies from some EU countries.	148 274 321	3 623	
	(UC R)		59 975 284	97	
IMGA Iberia Equities ESG	(UC A)	Invests a minimum of 85% of its net asset value in equity primarily of companies listed on regulated markets in Portugal and Spain, or, if listed on another regulated market, with management or relevant revenue sources in these two markets.	2 783 826	290	
	(UC I)		2 702 357	5	
IMGA European Equities	(UC A)	Invests a minimum of 85% of its net asset value in equity of companies listed on the regulated markets of the EU, Norway and Switzerland.	36 425 815	3 932	
	(UC R)		3 262	9	
	(UC I)		17 017 084	5	
IMGA Ações América	(UC A)	Invests a minimum of 85% of its net asset value in equity primarily listed on us markets.	36 178 752	2 511	
	(UC R)		9 230	4	
	(UC I)		18 377 572	5	
IMGA Global Equities Selection	(UC A)	Invests a minimum of 85% of its net asset value in equity primarily of companies listed on regulated markets of EU and OECD countries.	25 922 106	1 843	
	(UC R)		6 403	3	
IMGA Poupança PPR/OICVM	(UC A)	Primarily invests in bonds and a maximum of 35% in equity.	443 638 788	26 539	
IMGA Investimento PPR/OICVM	(UC R)	Invests in bonds and a maximum of 55% in equity.	39 004	5	
	(UC A)		44 708 268	6 022	
EuroBic PPR/OICVM Ciclo de Vida	(UC R)	A fund composed of the following four sub-funds, which invest primarily in bonds and	17 872	2	
			A maximum of 55% in equity.	1 767 633	867
			A maximum of 45% in equity.	2 888 980	1 429
			A maximum of 35% in equity.	4 281 693	1 462
			A maximum of 15% in equity.	7 994 218	1 203
EuroBic Seleção TOP		Invests at least 70% of its net asset value in investment fund units, preferably with hedge fund objectives.	4 365 354	51	
IMGA Flexível	(UC A)	Invests in equity, bonds, certificates and other money market instruments, ETFs, units in other funds, bank deposits, derivative financial instruments, and the weight of any of the above-mentioned financial instruments may vary, without minimum and maximum limits by class of assets.	11 816 237	959	
	(UC R)		917	1	
IMGA Liquidez	(UC A)	Exclusively invests in low volatility, short-term financial instruments.	542 069 838	19 331	
	(UC R)		10 214	3	
	(UC I)		13 779 300	4	
CA Curto Prazo		Invests a minimum of 50% of its net asset value in transferable securities, money market instruments and bank deposits, with a weighted average residual maturity equal to or shorter than 12 months.	15 942 116	1 003	
IMGA Rendimento Mais		Invests the majority of its assets in fixed or floating-rate bonds, guaranteed by credit, seniors, subordinates, with no maturity cut-off, or other debt instruments of an equivalent nature. Does not invest in common equity or in convertible transferable securities.	77 710 189	3 942	
IMGA Rendimento Semestral	(UC A)	Invests the majority of its assets in funds issued by private entities or issued/guaranteed by public entities or international bodies. Does not invest in common equity.	189 411 271	9 336	
	(UC R)		18 972	3	
IMGA Euro Taxa Variável	(UC A)	Invests mostly in floating-rate bonds and a maximum of 25% of its net asset value in fixed-rate bonds.	227 047 072	16 191	
	(UC R)		453 249	1	
IMGA Dívida Pública Europeia	(UC A)	Invests the majority of its assets in funds, of which a minimum of 50% are fixed rate.	10 549 565	933	
	(UC R)		1 966	2	
IMGA Iberia Fixed Income ESG	(UC A)	Primarily invests its assets in debt securities and money market instruments of private and public issuers based in Portugal and Spain.	1 379 289	95	
	(UC R)		953	1	
IMGA Alocação Defensiva	(UC I)	Invest a maximum of 95% in fixed-rate bonds and 20% in equity.	2 097 345	4	
	(UC A)		18 480 581	1 225	
IMGA Alocação Conservadora	(UC A)	Invests a maximum of 80% in fixed-rate bonds and 35% in equity.	779 635 079	29 588	
	(UC R)		942	3	
IMGA Alocação Moderada	(UC A)	Invests a maximum of 70% in fixed-rate bonds and 66% in equity.	197 032 091	8 767	
	(UC R)		970	3	
IMGA Alocação Dinâmica	(UC A)	Invests a maximum of 100% in equity and 60% in fixed-rate bonds.	76 232 777	4 620	
	(UC R)		4 177	3	
PME FLEX	(UC I)	Alternative Investment Fund The Fund invests mainly in short-term debt instruments of Portuguese SME's	76 232 777	1	
Fund Total	30		4 140 137 182		

Annex 2 - Pre-contractual disclosure for financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and the first paragraph of Article 6 of Regulation (EU) 2020/852

Name of the Product: **IMGA Money Market**
 Legal Entity Identifier (LEI Code): **54930083L3U5K4CA5E02**
 Fund Code (CMVM): **1247**

Environmental and/or social characteristics

"Sustainable Investment" means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective, and that the investee companies respect good governance practices.

The **EU Taxonomy** is a classification system provided for in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the taxonomy or not.

Does this financial product have a sustainable investment objective?

Yes

 No

<input type="checkbox"/> It will dedicate at a minimum of sustainable investments with an environmental objective: ___% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> Will make a minimum of sustainable investments with a social objective: ___%	<input checked="" type="checkbox"/> It promotes environmental/social (E/S) characteristics and, while it does not have as its objective a sustainable investment, will dedicate a minimum proportion of 1% to sustainable investments <ul style="list-style-type: none"> <input type="checkbox"/> with an environmental objective in economic activities qualified as environmentally sustainable under the EU taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective <input type="checkbox"/> Promotes E/S characteristics, but will not make any sustainable investments
---	---



What environmental and/or social characteristics are promoted by this financial product?

IMGA, in managing the fund, takes into account financial and sustainability criteria in order to integrate environmental, social and good governance criteria in its investments. To this end, it pays special attention to the following ESG (Environmental, Social and Governance) characteristics:

i. Environmental sustainability: It looks for characteristics that promote mitigation and adaptation to climate change, by analyzing its investments in terms of management, pollution prevention and control, efficiency in the use of raw materials, namely water and scarce resources, protection and restoration of biodiversity and ecosystems, and through the way each issuer manages its impact on the ecosystem and wildlife.

ii. Under social sustainability: Factors such as respect for human rights are taken into account, with a focus on measures taken to protect civil and political rights, as well as economic, social and cultural rights, including child and forced labor, and management of human capital and labor relations, which includes managing risks related to shortages of skilled labor through retention and recruitment programs and training programs. It also includes issues such as managing trade union freedom and nondiscrimination, as well as working hours and minimum wages. Issues related to occupational health and safety are also considered, including how issuers manage the risks of occupational accidents, business ethics, such as compliance with anti-competitive practices, intellectual property protection, accounting and tax practices. It also includes the management of risks related to corruption.

iii. In terms of governance: Promotion of good practices in terms of composition and structure and operation of the management body, including independence of members and effectiveness of the supervisory body, experience and leadership of the management body with demonstrated ability in terms of representation and accountability to shareholders, remuneration structure, transparency of corporate information and existence of an appropriate and transparent structure for the management of ESG issues.

The Fund is committed to further promoting environmental and social characteristics by increasing its level of investment in issuers or issuances that hold a minimum ESG rating, with the overall objective of an improvement in the Fund's ESG rating level.

ESG criteria in the investment decision-making process are incorporated together with traditional financial criteria.

● ***What sustainability indicators are used to measure the achievement of each of the environmental or social characteristics promoted by this financial product?***

Incorporating ESG criteria into investment decisions involves two major components in the investment process:

- Exclusion (negative screening) of controversial sectors or companies that have most of their revenues dependent on specific businesses, namely Gaming, Controversial Weapons, Tobacco and Thermal Coal;
- Positive reweighting of issuers identified with low material environmental, governance and sustainability (ESG) exposure risks.

The Fund seeks to achieve a minimum percentage in issuers that meet the defined ESG criteria and ESG rating, and these are sourced through independent external providers who are leaders in ESG research, rating and analysis and who support investors in developing and implementing responsible investment strategies.

The rating reflects the ESG risk not managed by the issuers, based on indicators considered material for each sector of activity, of the intrinsic characteristics of the issuer itself and of its framework in ESG terms within the sector in which it operates. In assigning an ESG rating, the governance component is a fundamental element, and is seen as one of the major material risks, transversal to all activity sectors. Incorrect or inappropriate governance practices may significantly impair the issuers' ability to execute their business strategy, including ESG strategy.

● ***What are the objectives of the sustainable investment that the financial product partially intends to make and how does sustainable investment contribute to those objectives?***

The Fund is committed to further promoting environmental and social characteristics by increasing its level of investment in issuers or issuances that hold a minimum ESG rating, with the overall objective of an improvement in the Fund's ESG rating level.

The Fund will allocate a minimum of 1% in sustainable investments with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU taxonomy, and also in socially sustainable investments.

Sustainability indicators measure how the environmental or social features promoted by the financial product are achieved.

The weighting of the various dimensions of sustainability is determined by the sector of activity in which each issuer operates, giving greater weight to the sectors most relevant to each of the industries.

How come the sustainable investments that the financial product aims to achieve in part do not significantly undermine any environmentally or socially sustainable investment objective?

The Fund monitors a set of indicators, through information from ESG research providers, which, in their evaluation methodologies, incorporate the objectives defined in terms of both environmental and social sustainability, and issuers identified with low material environmental, social or governance exposure risks, which would not receive a favorable rating if any of these objectives were significantly impaired, are positively reweighted in their investment decisions. Exclusion criteria are also used, analyzing the controversies to which the issuers are exposed and the compliance with global sustainability guidelines and principles, namely in terms of human rights, labor practices, environmental protection and anti-corruption. To this extent the fund aims to make investments in issuers considered sustainable and that meet the technical criteria to avoid significant damage in environmental or social terms.

In addition, the Company uses exclusion criteria, analysis of controversies, as well as positively reweight in their investment decisions the issuers identified with low material risks of environmental, social or governance exposure.

How have indicators for adverse impacts of sustainability factors been taken into account?

Negative impact indicators are monitored in the investment analysis, and this analysis is already incorporated in the ESG ratings of external providers, for each industry in which the issuer companies operate and for factors intrinsic to the issuer itself. The rating attribution model, in its quantitative component, considers several negative impact indicators to identify the most relevant ESG criteria for each industry, such as category 1, 2 and 3 greenhouse gas emissions, water consumption, etc. The materiality of these indicators in each industry is determined based on research, including information obtained through the Sustainability Accounting Standards Board (SASB) and the United Nations Principles for Responsible Investment (PRI).

As mentioned above, the mitigation of possible adverse impacts is also done through the application of exclusion criteria as well as the evaluation and follow-up of possible controversies of the companies analyzed.

How are sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Detail:

Only investments in issuers that do not have non-compliance with any of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights are considered sustainable.

IM Gestão de Ativos is, since February 2021, a participant in the United Nations Global Compact, committing to align its strategy in order to adopt and promote in its culture and daily activity the 10 Principles of the UN Global Compact on human rights, labor practices, environmental protection and anti-corruption, whereby only investments in issuers in which situations of non-compliance with any of these principles have not been identified are considered sustainable.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



Does this financial product consider the main negative impacts on sustainability factors?

Yes, the Fund takes into account the main negative impacts on sustainability factors, integrating several environmental and social indicators in the rating methodology. The information on sustainability indicators is included in the integral annex in the Fund's periodic information (Annual Report and Accounts), which will be disclosed pursuant to Article 11(2) of the SFDR Regulation (Regulation (EU) 2019/2088).

No



What investment strategy does this financial product follow?

The Fund, in its investment strategy, takes into consideration environmental, social and governance criteria, which allows it to identify sustainability risks that, should they occur, could have an impact on the value of the investment.

The Fund is committed to further promoting environmental and social characteristics by increasing its level of investment in issuers or issuances that hold a minimum ESG rating, with the overall objective of an improvement in the Fund's ESG rating level, a positive controversial engagement rating and no non-compliance with the UN Global Compact Principles, the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights.

- Incorporating ESG criteria into investment decisions involves two major components in the investment process:
- Exclusion (negative screening) of controversial sectors or companies that obtain most of their revenues dependent on specific businesses, namely Gambling, Personal Weapons and Tobacco;
- Positive reweighting of issuers identified with low material environmental, governance and sustainability (ESG) exposure risks.

The ESG criteria in the investment decision-making process are incorporated together with traditional financial criteria.

● **What are the mandatory elements of the investment strategy used to select the investments to be made to achieve each of the environmental or social features promoted by this financial product?**

The mandatory elements used to select the investments to be made with the objective of promoting environmental and/or social and governance features are those described above, namely:

Exclusion criteria: Where issuers that derive most of their revenues from the activities referred to in the previous point are excluded from the investment universe;

Qualification with the minimum ESG rating (only applicable to private issuers) and non-involvement in controversies considered to be of significant risk, namely related to situations of non-compliance with the Principles and Guidelines described above.

Notwithstanding, Issuances from issuers not qualified as sustainable or without ESG rating notation attributed may also be considered as investments that comply with the environmental and/or social characteristics promoted by the Fund as long as these issues are classified as green, social or sustainable (sustainable, green and social bonds).

As per investments in Collective Investment Undertakings (CIUs), these have to be set up under Articles 8 or 9 of the SFDR Regulation (Regulation (EU) 2019/2088), and the quota-share of the shareholding held in such undertakings that qualifies as sustainable is considered sustainable.

● **What is the commitment minimum rate to reduce the scope of investments considered prior to the application of this investment strategy?**

There is no commitment to a minimum rate of reduction of the investments considered prior to the application of the investment strategy.

● **What is the policy to assess the good governance practices of the investee companies?**

In assigning an ESG rating, the Governance component is a key element, being seen as one of the most material risks, transversal to all activity sectors. Incorrect or inappropriate governance practices may significantly impair the issuers' ability to execute their business strategy, including ESG strategy. Therefore, the following factors are taken into account:

- Fostering good practices in terms of composition and structure and operation of the management body, including independence of members and effectiveness of the supervisory body, experience and leadership capacity of the management body with demonstrated ability regarding representation and accountability to shareholders;
- Remuneration structure;
- Transparency of corporate information;
- Existence of an appropriate and transparent structure for managing ESG issues.

Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



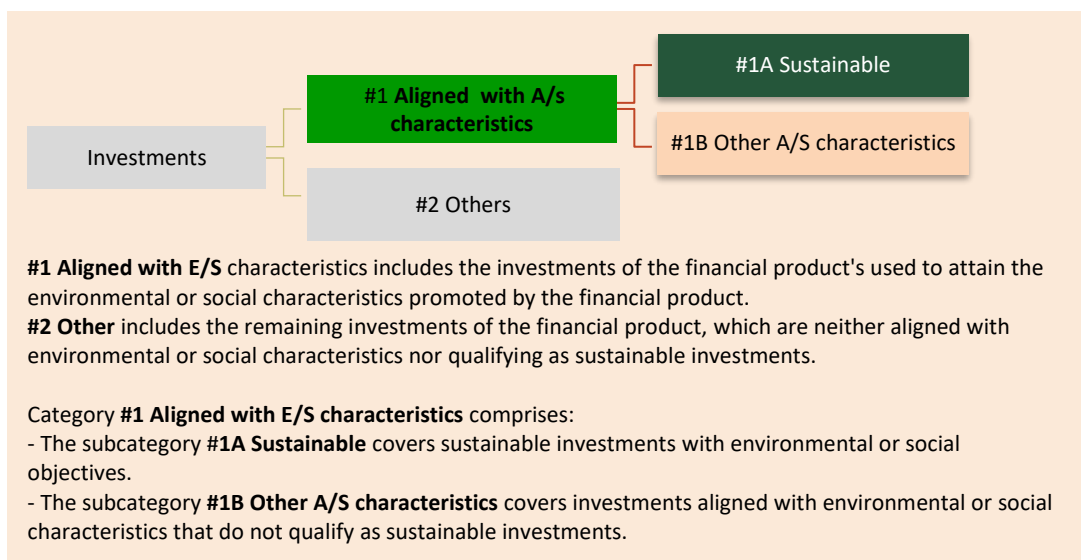
What asset allocation is planned for this financial product?

The Fund will invest a minimum of 10% in issuers that, in the opinion of the management company, promote environmental and/or social characteristics.

Thus, a minimum of 10% of the Fund's total investments will be investments aligned with environmental and/or social features, as such falling under category #1, with the remaining proportion falling under category #2 "Other". A minimum of 1% will be considered as "sustainable", according to category #1A, but there is no minimum initial commitment that they be made in activities that contribute to an environmental (according to EU taxonomy) or social objective.

The activities aligned by taxonomy are expressed as a percentage of the following:

- **Business turnover**, reflecting the share of revenues from green activities of the investee companies;
- **Capital expenditures (CapEx)**, showing the green investments made by the investee companies, e.g., with a view to transitioning to a green economy;
- **Operating expenses (OpEx)**, reflecting the green operating activities of the investee companies.



● **How does the use of derivatives contribute to achieving the environmental or social characteristics promoted by the financial product?**

Transactions with financial derivative instruments do not alter the environmental or social characteristics promoted by the Fund.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emission and the switching to renewables power or low-carbon fuels by the end of 2023. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transition activities are activities for which no low-carbon alternatives are not yet available and which, among others, have greenhouse gas emission levels corresponding to the best performance.



Are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



To what minimum extent, are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Fund has not set a minimum for sustainable investments with an environmental objective aligned with the EU Taxonomy

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU taxonomy¹?**

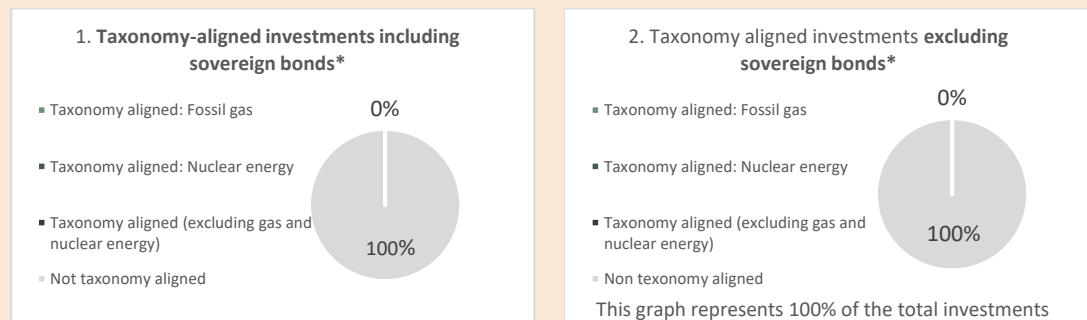
Yes

Fossil gas

Nuclear Energy

No

The two charts below show, in green, the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no suitable methodology to determine Taxonomy alignment for sovereign bonds*, the first chart shows alignment with the taxonomy in relation to all investments of the financial product, including sovereign bonds, while the second shows Taxonomy alignment only in relation to investments of the financial product other than sovereign bonds.



*** For the purposes of these graphs, "sovereign bonds" shall mean all sovereign exposures**

● **What is the minimum percentage of investments in transition and enabling activities?**

The Fund has not established a minimum percentage of investments in transition and enabling activities

¹ Fossil gas and/or nuclear related activities will only comply with the EU taxonomy if they contribute to limiting climate change ("climate change mitigation") and do not significantly undermine any objective of the EU taxonomy - see explanatory note in the left margin. All criteria for economic activities in the fields of fossil gas and nuclear energy that comply with the EU taxonomy are defined in Commission Delegated Regulation (EU) 2022/1214.



What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU taxonomy?

The Fund has not established a minimum percentage of sustainable investments with an environmental objective that are not aligned with the EU taxonomy.



What is the minimum percentage of socially sustainable investments?

The Fund has not established a minimum percentage of socially sustainable investments.



What investments are included in the "#2 Other" category, what is their purpose, and have minimum environmental or social safeguards been applied?

The investments in category "#2 Others" include deposits in financial institutions without ESG rating assigned or without available data that would allow their qualification as aligned with A/S characteristics, shares and/or bonds of issuers in the same conditions and the share of the investment in CIUs that do not meet this qualification, maintaining the limits established in the investment policy, but seeking, whenever possible, that they integrate sustainability risks and assessing the principal adverse impacts.

The purpose of these investments is to diversify the asset portfolio given the need for information on ESG matters that is not yet available for a very significant part of the issuers in the investment universe in which the Fund is included, seeking to make this component less and less representative as this information becomes available to the market.



Is a specific index been designated as a reference to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

No specific index has been designated as a benchmark to determine whether the Fund is aligned with the environmental and/or social characteristics it promotes.

- **How is the ongoing alignment of the benchmark index with each of the environmental or social characteristics promoted by the financial product ensured?**

N/A

- **How is ongoing alignment of the investment strategy with the index methodology ensured?**

N/A

- **How does the designated benchmark differ from a general relevant market index?**

N/A

- **Where can the methodology used to calculate the designated index be found?**

N/A



Where can I find more product specific information online?

You can obtain more specific information about the product on the website:

Specific information about this Fund can be found at www.imga.pt