



Invesco Asset Management Deutschland GmbH

Firm Brochure (Part 2A of Form ADV)

This brochure provides information about the qualifications and business practices of Invesco Asset Management Deutschland GmbH. If you have any questions about the contents of this brochure, please contact us at:

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The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission, or by any state securities authority.

Additional information about Invesco Asset Management Deutschland GmbH is available on the SEC's website at www.adviserinfo.sec.gov.

Material Changes

Material Changes since the Annual Update

No material changes have occurred since the previous review of the firm Brochure on 30 March 2020

Full Brochure Available

Whenever you would like to receive a complete copy of our Firm Brochure, please contact a member of our Compliance Department by:

Telephone at: +49 69 29807 239 or alternatively email: paul.dumitrescu@invesco.com

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Advisory Business

Firm Description

Invesco Asset Management Deutschland GmbH ("IAMD")

Invesco Asset Management Limited ("IAMD") is an indirect wholly owned subsidiary of Invesco Limited ("Invesco Ltd"). Further information about Invesco Ltd can be found below. The principal activity of IAMD is the provision of investment management services on a discretionary basis to pension plans, investment companies, banks, insurance companies and holding companies. IAMD also acts as an investment advisor for a number of mutual funds on a sub-advised basis.

IAMD is authorized and regulated by the German Federal Financial Supervisory Agency (Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin), as well as supervised by the German Federal Bank (Deutsche Bundesbank). Additionally, IAMD is registered with the United States Securities and Exchange Commission as a registered investment adviser.

History

Invesco Asset Management Deutschland GmbH ("IAMD") was founded in 1987.

Types of Advisory Services

IAMD operates the following investment centers:

Invesco Quantitative Strategies team ("IQS")

The Invesco Quantitative Strategies team ("IQS") is an investment team which was founded in 1983 in the US and was extended to European and global products in 1999 and 2001. The IQS team applies a global functional team approach utilizing quantitative techniques.

The investment team is committed to adding value for clients through systematic application of factor investing incorporated into a number of key client offerings such as market neutral, directional long/short and enhanced index strategies.

IQS provides a full range of investment capabilities for institutional clients including pension funds, insurance companies and holding companies worldwide and also sub-advises on a range of mutual pooled funds.

Invesco Real Estate Team (IRE)

Invesco Real Estate ("IRE") is the property investment management arm of IAMD. It operates in Germany as a branch of IAMD. IRE has been providing full-service investment solutions in Europe since 1996. Expertise ranges from fund management and structuring finance, acquisitions and asset management.

As part of a network of offices around the globe, IRE is ideally placed to provide a wide range of cross border real estate investment products and services to international institutional clients.

IRE manages real estate assets on a separate account and a pooled fund basis. The choice of vehicle depends on the investor's requirement and investment goals. IRE currently manages real estate investment solutions for clients via a range of fund strategies investing in the office, retail, industrial and hotel sectors and in all European property markets.

Asset Management

IAMD is an investment management company that manages segregated institutional accounts and other mutual pooled funds on a sub-advised basis.

As of 12/31/2020, IAMD manages approximately 28 USD billion in assets for approximately 122 mandates.

Fees and Compensation

Description

Invesco Quantitative Strategies team

Institutional Segregated Accounts

Where IAMD manages segregated institutional accounts, management and performance fees are charged. Management fees are negotiated with the client and charged on a monthly basis or quarterly subject to agreement.

Where applicable, performance fees are charged on an annual basis although subject to agreement can be charged quarterly.

Sub-Advised Accounts

Where IAMD provides investment management services on a sub-advised basis i.e. on behalf of another investment adviser within the Invesco

group, IAMD receives 40% of the net management and performance-based fees charged (net management fees are fees net of any rebates).

Management fees are paid out of fund assets to the fund's investment adviser (or its affiliates) for managing the fund's investment portfolio. Clients are therefore not invoiced and do not have fees deducted from their accounts.

Fees are not charged in advance of any investment management service being provided.

Fees are agreed at the point of completing the Investment Management Agreement for an institutional mandate.

Description

The annual investment management fee of IQS is based on a percentage of the investable assets according to the following schedule:

First 50 mln USD	0.10%	to	1.00%
Next 50 mln USD	0.10%	to	1.00%
Next 100 mln USD	0.10%	to	1.00%
Next 200 mln USD	0.10%	to	1.00%

The fee structure above is applicable for products with tracking errors between 1% and 5%.

Invesco bases its fees on a percentage of assets under management and/or on performance (performance-based fees). Fees are negotiable.

Invesco Real Estate

IRE's fees are not standard and are based on assets under management and calculated either based on the net or the gross asset value. Property acquisition, disposal and performance fees may also be charged.

Fund fees vary and are set out clearly in each fund prospectus. Please refer to the relevant fund prospectus for further information.

Fees on separate accounts are negotiated with the client and agreed up front in the investment management agreement. Negotiations are dependent on a number of variables including:

- Size of mandate
- Risk return criteria
- Return targets
- Level of discretion
- Scope (geography)

Fees may be reassessed and agreed with the client at the end of the mandate or if there is a change to the mandate or the scope of work.

Fee Billing

Investment management fees and, where applicable, performance fees are billed at the end of the relevant period (i.e. monthly, quarterly or yearly) unless otherwise defined in a particular contract or being nonrecurring fees like property acquisition, disposal and performance fees. Fees are not payable before the service is provided. Payment in full is expected upon invoice presentation unless otherwise defined in a particular contract.

Other Fees

Custodians may charge transaction fees on purchases or sales of certain mutual funds and exchange-traded funds. These transaction charges are usually small and incidental to the purchase or sale of a security. The selection of the security is more important than the nominal fee that the custodian charges to buy or sell the security.

IAMD in its sole discretion, may waive its minimum fee and/or charge a lesser performance fee based upon certain criteria e.g. historical relationship, type of assets, anticipated future earning capacity, anticipated future additional assets, dollar amounts of assets to be managed, related accounts, account composition, negotiations with clients, etc.

Past Due Accounts and Termination of Agreement

Contracts are terminable by any of the two parties within 30 days prior to written notice unless otherwise specifically defined in the agreement.

Depending on the competitive peer group for similar strategies, the strength of the client relationship and potential for asset growth going forward, fees are agreed upfront and may be reassessed at the end of the contract period or in exceptional circumstances; for instance, where the mandate is at risk due to underperformance, lower fees may be considered.

Fees may be reassessed at the end of the mandate, or in the case of a change to the mandate or the scope of service rendered.

Potential Conflicts Generated from Varying Fee Structures

IAMD does not operate a standard charging structure. IAMD undertakes discretionary portfolio management and real estate related investment services for more than one client or fund and different fee structures (e.g. performance related fees and fixed annual management charges) may exist for client portfolios, which may potentially represent incentive for allocation.

How are Conflicts Addressed

IAMD has strict allocation procedures in place to ensure fair allocation of securities and properties. In addition, when carrying out client transactions, IAMD will combine orders where this is in the best interest of the clients as a whole.

Any exception that could occur over the course for IRE activities are justified and duly documented as per the Conflict of Interest Dealing Policy.

Performance-Based Fees

Invesco Quantitative Strategies

IQS charges performance related fees:

A fixed fee of 0.05% - 0.40% plus 10% - 20% of the outperformance above benchmark is charged. A high watermark is applied. Performance fees are negotiable.

Types of Clients

Invesco Quantitative Strategies

Clients include institutional investors including corporate bodies, pension funds, public bodies, banks and other sophisticated investors as well as mutual funds on a sub-advised basis.

The minimum account size is EUR 25 million for segregated accounts of assets under management, although account minimums are negotiable.

For a segregated account the total expenses of our asset management activities would be the above-mentioned management fee.

In the case of a sufficient number of investors, pooled accounts may be set-up with the minimum account size of EUR 5 million per Client. The pooled account fee includes administration charges, custodian fees etc.

Invesco Real Estate

IAMD manages funds and segregated accounts on both a direct and sub-advised basis.

Clients include international institutional clients including insurance companies, pension funds, banks, asset managers and fund of funds.

Minimum investment into a fund is typically €5-10m although there is discretion to waive this. The minimum investment for a separate account is not typically below €50-100m.

Methods of Analysis, Investment Strategies and Risk of Loss

Invesco Quantitative Strategies

Methods of Analysis

IQS employs a quantitative, multi factor model in the investment process. The buy/sell decisions are a function of the optimization process, a process whereby statistical inputs based on research done by the investment team are utilized to generate an optimal portfolio.

The inputs to the optimization process include: the multi factor rating from the Stock Selection Model, the risk exposures for each stock from the Risk Model, transaction cost estimates, and client guidelines.

After a final review performed by a member of the portfolio management or research team the portfolio is traded.

Investment Strategies

The team is committed to adding value for clients through systematic application of factor investing.

Risk and return are the focus of the team's efforts. Suitable stocks are selected based on a multi factor model using momentum, quality and value factors.

A highly efficient and systematic process to capture the insight contained in these factors is utilized in the portfolios. To preserve the value added through the Multi Factor Model, transaction costs are minimized where possible.

Central to the investment process are IQS's proprietary models, which are designed to consistently capture added value. The models are flexible and have been applied successfully across various styles, capitalization ranges, benchmarks, risk levels and geographic regions. Rigorous risk control is a key element of all strategies offered by Invesco Quantitative Strategies.

The following outlines the properties of the main strategies offered by Invesco Quantitative Strategies:

Invesco Enhanced Index

An Enhanced Index strategy is a broadly diversified portfolio, structured to generate excess returns versus the respective equity benchmark from a large number of small active positions. Excess return targets with a low tracking error are the primary attraction of this strategy.

Invesco Quantitative Core Equity

A Quantitative Core strategy is a broadly diversified portfolio, structured with the aim of generating excess returns from a large number of small active positions. Excess return targets with moderate tracking error are the primary attraction of this strategy.

Invesco Global Balanced Solutions

A Global Balanced Solution is a portfolio that typically embraces at least two asset classes and generally aims to achieve predefined long-term outcomes in terms of return and risk profiles through the combination of strategic and tactical asset allocation with risk control mechanisms that seek to limit downside exposure.

Invesco Market Neutral

A Market Neutral Strategy is a diversified portfolio, structured with the aim of generating positive absolute returns from active positions. The investment strategy with a neutral net market exposure allows shorting to also benefit from expected underperformers and to additionally enhance the absolute return character.

Invesco Low Volatility

A Low Volatility strategy is a broadly diversified equity portfolio, constructed with the aim of generating attractive returns via the IQS multi factor model whilst delivering a risk level that is below the risk level of the equity market whilst being fully invested in equities.

Risk of Loss

Investing in securities involves risk of loss that clients should be prepared to bear.

The following risks apply to all IQS strategies and will be managed by IQS and/or its fund managers, unless otherwise stated, on behalf of their investors.

All investment programs have certain risks that are borne by the investor. Our investment approach constantly keeps the risk of loss in mind. Investors face the following investment risks among others:

- **Interest-rate Risk:** Fluctuations in interest rates may cause investment prices to fluctuate. For example, when interest rates rise, yields on existing bonds become less attractive, causing their market values to decline.
- **Market Risk:** The price of a security, bond, or mutual fund may drop in reaction to tangible and intangible events and conditions. This type of risk is caused by external factors independent of a security's particular underlying circumstances. For example, political, economic and social conditions may trigger market events.
- **Inflation Risk:** When any type of inflation is present, a dollar today will not buy as much as a dollar next year, because purchasing power is eroding at the rate of inflation.
- **Currency Risk:** Overseas investments are subject to fluctuations in the value of the dollar against the currency of the investment's originating country. This is also referred to as exchange rate risk.
- **Reinvestment Risk:** This is the risk that future proceeds from investments may have to be reinvested at a potentially lower rate of return (i.e. interest rate). This primarily relates to fixed income securities.
- **Business Risk:** These risks are associated with a particular industry or a particular company within an industry. For example, oil-drilling companies depend on finding oil and then refining it, a lengthy process, before they can generate a profit. They carry a higher risk of profitability than an electric company, which generates its income from a steady stream of customers who buy electricity no matter what the economic environment is like.
- **Liquidity Risk:** Liquidity is the ability to readily convert an investment into cash. Generally, assets are more liquid if many traders are interested in a standardized product. For example, Treasury Bills are highly liquid, while real estate properties are not.
- **Financial Risk:** Excessive borrowing to finance a business' operations increases the risk of profitability, because the company must meet the terms of its obligations in good times and bad. During periods of financial stress, the inability to meet loan

obligations may result in bankruptcy and/or a declining market value.

- Credit or counterparty risk is the risk of loss if a fund's counterparty fails to meet its financial obligations. This is managed daily by fund managers and equity dealers monitoring and selecting reputable brokers through whom to execute trades. In addition, the selection process for each new Counterparty means that checks are conducted by the firm's Finance team to assess their financial standing. Exposure to each Counterparty is also limited through certain UCITs requirements, which are monitored through post-trade compliance reports. Further details on approved counterparties and their selection are set out in IAMD's Trade Execution Policy.
- Legal and documentation risk is the risk of not having contractual certainty if issues arise on the assets of the funds or with funds' counterparties. This is managed by Invesco's Operations, Legal and Transaction Processing teams where required, specifically for new counterparty set ups either for cash equities or cash fixed income trading or for Over the Counter (OTC) derivatives by ensuring relevant documentation is in place. There is a robust account opening process in place for all counterparties which should mitigate any legal risk. Where OTC instruments, are used, then appropriate documentation is reviewed and signed by Invesco's Legal team.
- Regulatory risk is the risk of loss from not complying with relevant regulations. Compliance of the funds with relevant regulations is monitored daily by fund managers at a pre trade level and by Invesco's Compliance Team at a post trade level. If any breaches are discovered, these are raised and resolved through the B Wise incident reporting process. If any of these breaches result in losses to the funds or relevant investors, these are made good by IAMD under the Invesco Continental European Error Policy. Details of all applicable investment restrictions are contained within either, the relevant Fund Manual or Prospectus/Investment Policy Guidelines.

Trading of Securities

Our investment strategy does not involve frequent trading of securities in normal market conditions.

Methods of Analysis & Investment Strategies

IRE implements a variety of different strategies depending on the nature of the mandate and the common theme is that they are all invested in private (unlisted) European real estate. IRE is research led and the real estate market research provides the basis for the strategic view which is then supplemented by the “on the ground” execution by the local European transaction and asset management teams.

IRE’s investment philosophy is underpinned by two fundamental principles – to maximize the predictability and consistency of investment returns and to control risk at every step of the investment process and portfolio design. This is achieved through a systematic approach that incorporates top-down economic and market research as well as in-depth bottom-up analysis based on the knowledge and skills of our experts in our well-established platform of local offices across Europe.

IRE’s investment mandates are spread across geography, risk return spectrum and sectors. This provides experience and access to most European markets across a range of strategies.

IRE’s experience and resources for managing both direct real estate and deal structuring, and financing provides the ability to adopt different strategies depending on the mandate. However, at the core of all investments is the belief that it is the real estate that will ultimately underpin returns and therefore transactions will only be undertaken if the fundamental real estate investment is a sound one.

Risk of LossDirect Real Estate

IRE has several methodologies and systems in place to manage risk and to ensure consistent application of IREs investment philosophy and process.

The first process is our House View. On a semi-annual basis, our investment teams undertake a formal review of our House view and submit this to the investment committee for approval. The House View combines the empirical and anecdotal evidence from our investment disciplines, research, asset management and acquisitions and sets forth where we see the best relative value from both a property type allocation and market selection standpoint – two very key decisions in providing strong relative returns. Portfolio management then incorporates the House View into the clients’/funds’ investment plans and is charged with implementation.

In addition, IRE utilizes a team-oriented investment process. The team includes members from Portfolio Management, Research, Acquisitions,

Underwriting, Closing Services, and Asset Management. Each member of the investment team must sign-off on an investment. A potential investment may be vetoed at any time by one member of the team. The investment review process requires unanimous preliminary and final investment committee approval. We believe it is extremely important to provide several independent checks throughout our due diligence of each potential investment, and it is important to provide structural controls within the ownership documents which limit risk exposure.

To further manage and minimize risk within the account, IRE will take the following measures:

- Purchase assets in IRE's qualified markets
- Acquire assets that possess institutional-quality physical and locational attributes that provide reasonable assurance of an adequate pool of potential purchasers upon sale of the property
- Structure the investment to maximize the account's control
- Place restrictions on the maximum size of any one investment
- Diversify the strategies employed within the program
- Put all investments through IRE's rigorous investment and due diligence process
- Carefully monitor leverage levels and maturities consistent with the risk expectations
- Carefully monitor tenant and industry exposure
- IRE's Asset Management resources establish processes throughout the holding period to mitigate risk and maximize value of each investment

Individual accounts are also governed by the account documents which include the investment guidelines. The account's portfolio management team reviews compliance to guidelines as part of the quarterly reporting process. Any potential issues related to investment guidelines would be shared with the account's Advisory Committee as well as Compliance. Should a revision be needed, the change would be reflected as an amendment to the account document and all investors would be notified of the change. All account management personnel are Invesco employees and subject to Invesco Compliance policies.

For a comprehensive discussion on risk factors of the account, see the "Risk Factors & Potential Conflicts of Interest" section in the offering Memorandum.

Trading of Securities

It is not possible to trade real estate frequently; assets are typically held on average for 5 years.

Coronavirus and Public Health Emergencies

COVID-19 has resulted in numerous deaths, adversely impacted global commercial activity, and contributed to significant volatility in certain equity and debt markets. Measures taken by national and regional governments, states, districts, and municipalities, as well as the general uncertainty surrounding the dangers and impact of COVID-19, are creating significant disruption in supply chains and economic activity. As COVID-19 continues to spread, the potential impacts, including a global, regional, or other economic recession, are increasingly uncertain and difficult to assess. Any public health emergency, including any outbreak of COVID-19, SARS, H1N1/09 flu, avian flu, other coronavirus, Ebola or other existing or new epidemic diseases, or the threat thereof, could have a significant impact on Invesco Advisers and its client accounts. The extent of the impact of COVID-19 or any other public health emergency on the operational and financial performance of Invesco Advisers' client accounts will depend on many factors, including the duration and scope of such public health emergency, the extent of any related travel advisories and restrictions implemented, the impact of such public health emergency on overall supply and demand, goods and services, investor liquidity, consumer confidence and levels of economic activity and the extent of its disruption to important global, regional and local supply chains and economic markets, all of which are highly uncertain and cannot be predicted. The effects of a public health emergency may materially and adversely impact the value and performance of the investments held in any client accounts as well as the ability of Invesco Advisers to source, manage and divest investments and achieve the investment objectives of its clients, all of which could result in significant losses to such clients. In addition, the operations of Invesco Advisers and/or its affiliates may be significantly impacted, or even halted, either temporarily or on a long-term basis, as a result of government quarantine and curfew measures, voluntary and precautionary restrictions on travel or meetings and other factors related to a public health emergency, including its potential adverse impact on the health of any such entity's personnel. The full effects, duration and costs of COVID-19 are impossible to predict, and the circumstances surrounding the COVID-19 will continue to evolve.

Disciplinary Information

Legal and Disciplinary

The firm and its employees have not been involved in legal or disciplinary events related to past or present investment clients.

Other Financial Industry Activities and Affiliations

Financial Industry Activities

IAMD is a registered investment adviser with the Securities and Exchange Commission. IAMD does not recommend or select third party investment advisers for our clients nor does it receive compensation directly or indirectly from those advisers.

Affiliations

Operating under the legal entity IAMD, IQS manages funds and segregated accounts on a sub-advised basis for other Invesco entities, including Invesco Advisers, Inc. an affiliate of IAMD. For further information about this affiliation please refer to filings made with the SEC by Invesco Advisers, Inc.

Invesco Real Estate (the property management arm of Invesco) operates in Germany as a branch of IAMD.

IAMD has entered into various advisor/sub-advisor arrangements with the following related investment advisers:

- Invesco Asset Management (Japan) Limited
- Invesco Advisers, Inc.
- Invesco Hong Kong Limited
- Invesco Asset Management Limited
- Invesco Asset Management S.A.
- Invesco Australia Limited

- Invesco Management S.A.
- Invesco Real Estate TAM S.A.R.L.
- Invesco Trust Company
- Invesco Asset Management Singapore Ltd
- INVESCO REAL ESTATE MANAGEMENT S.À R.L.

Certain other registered investment adviser subsidiaries of Invesco Ltd. (IAMD ultimate parent) may from time to time have other arrangements not specified in this filing. For more information regarding these related persons, please refer to filings made with the SEC by the following related persons:

Firm Name	Firm SEC Number/CRD #
Invesco Asset Management (Japan) Limited	801-52601/107155
Invesco Asset Management Ltd.	801-50197/109985
Invesco Hong Kong Limited	801-47856/109923
Invesco Private Capital, Inc.	801-45224/107584
Invesco Senior Secured Management, Inc.	801-38119/107590
Invesco Capital Management LLC	801-61851/125601
WL Ross & Co. LLC	801-67779/141854
Invesco Canada Ltd.	801-62166/126572

Invesco Investment Advisers LLC	801-1669/104885
IRE (Cayman) Limited	802-74648/162075
Invesco Global Real Estate Asia Pacific, Inc.	801-74650/161544
Jemstep, Inc.	801-70734/151692
Invesco Asset Management (India) PVT. LTD.	801-108727/285620
Invesco Managed Accounts, LLC	801-61716/154461
Harbourview Asset Management Corporation	801-27136/104979
OppenheimerFunds, Inc.	801-8253/104983
Invesco European RR L.P.	801-115138/301129
Invesco RR Fund L.P.	801-115139/301135
Invesco Loan Manager, LLC	801-118817/306746

Conflicts

Trades Executed Via Counterparties

IAMD manages the segregated mandates of approved counterparty firms and may, at the same time, use such firms for the execution of investment trades which will result in the payment of commissions. This could incentivize the favoring of a broker or client when trading.

Dealers have a fiduciary responsibility to obtain best possible results for clients when executing orders and have full discretion for placing deals on behalf of clients with a broker to ensure that best execution obligations are met. Fund managers cannot exert any influence and the dealing team is segregated from the fund managers. Invesco has policies and procedures in place to ensure that best execution is achieved. These policies and procedures are subject to monitoring.

Group Funds

A conflict may arise where the guidelines authorize transactions in units or shares of funds within the Group or any company of which IAMD or

any other Associate is the manager, operator or adviser. Where permitted by investment guidelines of product managed, Invesco funds may only be purchased on their investment merits or where mandated to do so. IAMD Fund managers must confirm that a purchase of an Invesco fund is driven by investment merit and that there is no non-public information influencing the decision. Invesco funds as investors in other Invesco funds are treated at arm's length. Mitigation arrangements also include, where appropriate, a full rebate of the management fee in order to avoid "double-dipping".

Execution/Client Order Handling

IAMD undertakes discretionary portfolio management and real estate related investment services for more than one client or fund and different fee structures (e.g. performance related fees and fixed annual management charges) may exist for client portfolios, which may potentially affect incentive for allocation. IAMD has in place strict allocation procedures to ensure fair allocation of investment opportunities to all clients.

In addition, when carrying out client transactions, IAMD will arrange to execute orders in due turn but may combine orders where this is believed to be in the best interest of the clients. If there is insufficient liquidity for either purchases or sales, Invesco will allocate the orders for the purchase or sale of the security on a pro rata basis based on relative order size. This is subject to monitoring. In certain circumstances an allocation of a trade may deviate from a pro rata approach. Such instances must be justified, be reasonably be in the best interests of all the affected clients and clearly documented. In addition, from time to time IAMD may, where permitted by mandate, sell an investment from one client to another. These are recorded and monitored. The transfer of real estate investments requires the confirmation by Invesco Real Estate Senior Management and Compliance that conflicts of interests are appropriately considered.

Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics – Overview

The employees of IAMD have adopted a written Code of Ethics and Personal trading policy (the “Code”) and Policy Statement on Insider Trading Prohibitions.

The Code applies to all employees and establishes guidelines for professional conduct and personal transactions procedures. The Code helps IAMD to detect and prevent potential conflicts of interest as well as supports the monitoring and controls surrounding material non-public information & inside information.

Adherence to the Code, both letter and spirit, is a fundamental and absolute condition of employment with IAMD.

Trading for employee or client accounts will be restricted due to certain relationships with an actual or potential investee company. IAMD maintains and monitors a restricted list for such situations which is designed to avoid potential conflicts of interest or the appearance of an undue influence in the selection of investments.

It is appreciated that no policy nor Code can address every circumstance that may give rise to a conflict, a potential conflict or an appearance of a conflict of interest. Every Employee should be alert to any actual, potential or appearance of a conflict of interest with Invesco’s clients and to conduct himself or herself with good judgment. Failure to exercise good judgment, as well as violations of this Code, may result in the imposition of sanctions on the Employee, including suspension or dismissal. All Covered Persons are required to comply with applicable laws, rules and regulations and this Code. Covered Persons shall promptly report any violations of law or regulations or any provision of the Code of which they become aware to the Compliance Officer or his/her designee.

The Code is available to clients or prospective clients upon request.

Statement of Fiduciary Principles

A statement of fiduciary principles found in the Code of Ethics, Code of Conduct and other conflict management policies in force with IAMD denotes that as a fiduciary, IAMD owes an undivided duty of loyalty to its clients. It is IAMD’s policy that all employees conduct themselves so as

to avoid not only actual conflicts of interest with IAMD's clients, but also that they refrain from conduct which could give rise to the appearance of a conflict of interest that may compromise the trust our clients have placed in us.

The Code is designed to ensure, among other things, that all employees' personal securities transactions are conducted in accordance with the following general principles:

- A duty at all times to place the interests of IAMD's clients first and foremost; and
- The requirement that employees should not take inappropriate advantage of their positions.

IAMD's policy is to avoid actual or apparent conflicts of interest but, where they unavoidably occur, to record, manage, and disclose them to prevent abuse and protect our clients, employees and other counterparties.

IAMD does not make political contributions with corporate funds. No employee may, under any circumstances, use company funds to make political contributions, nor may represent their personal political views as being those of the company.

IAMD does not tolerate bribery. Employees must not offer, give, request, or agree to accept or accept financial or non-financial advantages of any kind where the purpose is to influence a person to behave improperly in their decisions or actions or to reward them for having done so.

Legislation as well as internal IAMD policy exist to protect Employees who 'blow the whistle' about wrongdoing within the firm. It shall encourage Employees to raise concerns internally in the first instance. IAMD Employees should feel able to raise any such concerns internally, confident that it will be dealt with properly and that all reasonable steps will be taken to prevent victimization.

Personal Account Dealing and Blackout Restrictions

In accordance with the Code, employees may invest in securities held by or deemed suitable for client accounts upon prior approval from the Compliance Department.

All transactions by employees which are subject to preclearance requirements through Compliance are also subject to certain trading restrictions. Notwithstanding the foregoing, no prior approval is required to invest in certain types of investments, including but not limited to

government securities, money market instruments, variable insurance products, currencies, commodities, open-end funds and Unaffiliated ETFs.

Blackout Restrictions – transactions generally will not be permitted during a specific period before and after a client account trades in the same security or instrument.

Certain employees may generally not buy or sell a security or any instrument within 3 days before or after the day on which any client account trades in the same security or instrument or in a security convertible into or exchangeable for such security or instrument.

IAMD operates personal account dealing procedures which details requirements for pre-clearance and/or notification, blackout periods and restrictions, and annual declarations. These transactions are recorded and monitored. In addition, periodic reports are produced identifying any violations and, where appropriate, making recommendations for procedural changes.

Conflicts

Employees and Fund Managers' Investments into Funds

Fund Managers can personally invest in the funds that they, or their colleagues, run; this is considered to be a positive thing and encouraged by IAMD. However, such investment raises the potential for there to be an incentive for these funds to be managed to meet the personal objectives of the Fund Manager(s) rather than in the best interests of the other investors, and for the Fund Manager to favor the fund he has invested in over other funds he manages. In mitigation, IAMD has strict procedures to ensure the fair allocation of stocks. These controls are subject to compliance review.

In addition, no employee should have ownership in or other interest in by any outside company which does business with IAMD. This does not apply to stock or other investments in a publicly held company, provided that the stock and other investments do not, in the aggregate, exceed 5% of the outstanding ownership interests of such company. IAMD may, following a review of the relevant facts, permit ownership interests which exceed these amounts if management or the Board of Directors, as appropriate, concludes that such ownership interests will not adversely affect Invesco's business interests or the judgment of the affected staff. Finally, Employees are prohibited from using personal hedging strategies or remuneration or liability related contracts of insurance to undermine any risk alignment effects embedded in their remuneration arrangements.

Inside Information

A potentially significant conflict that arises on a permanent basis is that some of our employees, to varying degrees, have access to material, non-public information concerning companies which may be price sensitive. IAMD mitigate this by explicit disclosure and approval through a restricted list and strict personal account dealing rules which are detailed in our Code of Ethics which applies to all employees. In addition, periodic compliance monitoring checks are carried out.

Outside Activities

Employees are also required to disclose activities outside their employment to mitigate any conflicts of interests that can arise in connection with such outside business activities. All outside business activities must be pre-approved prior to engagement. Certain activities may also be subject to conditional requirements addressing existing or potential future conflicts.

Entertainment and Gifts

Gifts and entertainment (including non-monetary gifts) are received and given that may influence behaviour in a way that conflicts with the interests of IAMD's clients. IAMD has a Gifts, Benefits and Entertainment Policy which details what is acceptable. Only non-monetary benefits which do not impair IAMD's duty to act in the best interests of our clients are allowed. Records are maintained and monitoring undertaken of gifts and entertainment both received and given. In addition, IAML will make any disclosures necessary under the European and German's Inducements regulations.

Political contribution

All political contributions made by IAMD employees subject to Pay-to-Play rules in the United States of America are subject to pre clearance and compliance review.

Conflicts

Fund Managers' Investments into Funds

Fund Managers can personally invest in the funds that they, or their colleagues, run; this is considered to be a positive thing and is encouraged by Invesco. However, such investment raises the potential

for there to be an incentive for these funds to be managed to meet the personal objectives of the fund manager(s) rather than in the best interests of the other investors, and for the fund manager to favor the fund he has invested in over other funds he manages. In mitigation, Invesco has strict allocation procedures to ensure the fair allocation of stocks. The accordant controls are subject to compliance review.

Personal Account Dealing

A conflict may exist as an employee or director of IAMD engages in personal account dealing, or is otherwise interested in any company whose securities are held or dealt in on the client's behalf, in respect of securities or services, whereas IAMD also has a client with an interest which potentially conflicts with such personal dealing activity. IAMD operates personal account dealing procedures which detail requirements for pre-clearance and/or notification, blackout periods and restrictions, and annual declarations. All such transactions are recorded and monitored by the responsible Compliance function.

Inducements and Business Entertainment and Gifts

Non-monetary benefit inducements as gifts and entertainment are received and given that may influence behavior in a way that conflicts with the interests of IAMD's clients. IAMD has an Inducements (Non-Monetary Benefits) Policy covering gifts, benefits & entertainment ("Inducements Policy") which details, depending on the investment service provided, what is acceptable or reasonable. Only non-monetary benefits which do not impair IAMD's duty to act in the best interests of our clients are allowed by the policy. Records are maintained and monitoring undertaken of non-monetary benefits both received and given. In addition, IAMD will make any disclosures necessary under regulations.

Inside Information

A potentially significant conflict that arises on a permanent basis is that some of our staff, to varying degrees, have access to material, non-public information concerning companies which may be price sensitive and about real estate investments which may affect the market price. We mitigate this by explicit disclosure and approval through strict personal account dealing rules and a Code of Ethics which applies to all staff. In addition, periodic compliance monitoring checks are carried out. Our Conflicts of Interest Policy details how conflicts are identified, managed, recorded and disclosed the section on the investment management process details how we execute trades on behalf of clients to ensure that one client is not favored to the detriment of another.

In addition, fund managers are compensated largely based on their three-year investment performance returns. This system is specifically designed to avoid short-term risk taking to achieve individual performance goals.

Brokerage Practices

Selecting Brokerage Firms / Best Execution

Trading counterparties must have undergone the initial approval process and ongoing monitoring of the EMEA Counterparty Risk Committee (ECRC) before IAMD can use them.

The decision-making process concerning the routing of an order to a counterparty that achieves the best result will be considered by reference to various Execution Factors: price, costs, speed and likelihood of execution and settlement, size and nature of order and any other consideration relevant to its execution. The choice of relevant venue and the means of accessing that venue are assessed by professional, competent traders weighing the main Execution Factors listed above. It is important to understand that the weightings considered are dynamic and may depend upon several variables and characteristics including the specific security being traded, the order type and market/execution venue conditions.

Subject to the weightings given to the Execution Factors referred to above, IAMD considers that the best possible result to the client will be driven by price considerations. Other Execution Factors, particularly size of order and likelihood of execution (both reflections of liquidity) will be considered in so much as they affect price.

Brokerage Fees

IAMD did not enter into any soft dollar arrangements.

Directed Brokerage

Please Note:

Client specific instructions are permitted within IAMD. By directing brokerage, clients may be unable to achieve most favorable execution of transactions.

Trade Aggregation

Invesco Quantitative Strategies

Portfolios are traded in the most cost-effective way. Thus, orders may be pooled at a security level where possible to optimize trading. If aggregated orders are not fully implemented, they are distributed on a pro-rata basis. Trades for clients with directed brokerage arrangements are undertaken after the pooled orders and clients are notified of this fact. The following criteria would serve, among other factors, as basis to optimize the trading activity.

- Client mandate restrictions;
- Regulatory restrictions;
- Certain market practices;
- Investment objectives of Client mandates;
- Subscriptions and redemptions;
- Cash positions;
- Potential trading volumes (or liquidity);
- Potential prices;
- Known commitments
- Other factors that may be pertinent to the trade.

Any such decision would be documented.

Conflicts

Conflicts of interest are avoided and where this is not possible, managed appropriately. A copy of the Conflicts of Interest policy is available upon request.

Review of Accounts

Invesco Quantitative Strategies:

Periodic Reviews

Account reviews with the client are normally performed semi-annually by the advisor's client facing portfolio manager. Account reviews are performed more frequently when market conditions dictate.

Review Triggers

Other conditions that may trigger a review are changes in the tax laws, new investment information, and changes in a client's own situation.

Client Reporting

At a minimum level, clients receive full monthly reports. The information and measurements contained in the reports are namely:

- Valuation
- Transactions
- Performance

In addition, some clients receive risk measurement reports and other clients, i.e. insurance companies, receive tailor made reports as required by the respective industry standards.

Client communication is frequent and statements of assets under management, performance and transactions undertaken are issued at least quarterly, depending on the client's needs. No extra fee is charged for this service.

Clients can, subject to agreement, determine the level of reporting they need to satisfy their requirements. These reports will be provided in written format.

Invesco Real Estate

Client Account Reviews

At least every six months each fund/mandate is subject to review by the "Fund Strategy Review Committee" (FSRC). The FSRC is a sub-set of the investment committee. For each review the portfolio manager is required to provide a full update of the fund and its proposed future strategy in accordance with a closely defined set of criteria. Prior to the update, the portfolio manager will have had to liaise with the asset management, research and acquisition teams in order to assess the overall fund strategy, individual asset business plans and then develop proposals for the fund's future strategy. The proposals are critically reviewed by the FSRC and if accepted, approved.

Client Reporting

At a minimum, client reports are delivered in writing on a quarterly basis although at times more frequently. The reports contain the profile of the portfolio plus an associated commentary.

Client Referrals and Other Compensation

Incoming Referrals

Invesco has received client referrals over the years. The referrals came from current clients, counterparties and other similar sources.

In addition, the firm may contract to pay solicitors if, following an invitation from a solicitor to participate in a search process, IAMD agrees to participate in the search and a client appoints IAMD as their appointed portfolio manager. IAMD compensates referring parties. These fees typically involve the firm paying a portion of its investment management fee to the solicitors.

Additionally, Invesco also uses online platforms to participate in tenders launched via them. A fixed administrative fee is paid at the time of submission of RFP's.

Referrals Out

Invesco does not accept referral fees or any form of remuneration from other professionals when a prospect or client is referred to them.

Other Compensation

None

Custody

Invesco Quantitative Strategies Team and Invesco Real Estate

The firm does not have custody of U.S. client or investor funds or securities therefore this section is not applicable to the firm.

Investment Discretion

Invesco Quantitative Strategies:

For institutional clients with segregated managed accounts, IQS will typically have full discretion for all buying and selling investment decisions made. The discretionary investment decisions must be made in

accordance with the investment objectives and restrictions agreed with the client, what can include geographical, asset type, weightings and specific stock restrictions, within the Investment Management Agreement. However, IAMD will consult with the client prior to each trade to obtain concurrence if a blanket trading authorization has not been given.

On occasion, clients may choose to retain the discretion to exercise the voting rights attached to their shareholdings rather than delegating this responsibility to the investment manager.

A Portfolio may be changed with the approval of the shareholders of the relevant Portfolio by way of Ordinary Resolution. This also applies to changes to the investment policies that are material in their nature, like the following ones:

- active duration exposures relative to benchmark
- currency risk (whether non-base currency positions are fully hedged, partially hedged or un-hedged)
- credit rating limits

For pooled funds offered to retail investors, IAMD will operate with full discretion within the limits set out in the fund's prospectuses.

Invesco Real Estate

There are different levels of discretion depending on the nature of the account. Some accounts and pooled funds have full discretion although it is more common for there to be some set constraints on the portfolio dependent on the investor's requirements and investment goal. Such constraints can include, among others:

- Size of the building that can be purchased
- Markets (countries) permitted to buy in

Pooled funds are managed with discretion in line with the limits set out in the fund prospectus.

There are also mandates which are advisory where all decisions need to be ratified by the client.

Voting Client Securities

Invesco Quantitative Strategies

Options for Clients on Voting

Clients either give us the full discretion to exercise voting rights on their behalf or retain that discretion to make their own arrangements to exercise voting rights. Unless the client designates otherwise, IQS votes proxies for securities over which it maintains discretionary authority consistent with its proxy voting policy. A copy of the Global Proxy Policy is available upon request.

Obtaining Information on Voting

Clients with institutional segregated mandates, or investors in our pooled funds, can request voting information from their usual sales contacts. IAMD will provide the record of votes that will reflect the voting instruction of the relevant fund manager. This may not be the same as votes actually cast as IAMD is entirely reliant on third parties complying promptly with such instructions to ensure that such votes are cast correctly. Accordingly, the provision of information relating to an instruction does not mean that a vote was actually cast, just that an instruction was given in accordance with a particular view taken.

Conflicts

IAMD has a responsibility for making investment decisions that are in the best interests of its clients. As part of the investment management process, IAMD may exercise its voting rights where authorized by clients, or in the collective interests of investors in a fund, to vote in respect of the shares/units for which the clients are beneficial owners. Invesco has adopted safeguards to ensure that our proxy voting is not influenced by interests other than those of our fund shareholders.

Financial Information

Financial Condition

IAMD does not have any financial impairment that will preclude the firm from meeting contractual commitments to clients.

A balance sheet is not required to be provided because IAMD does not serve as a custodian for client funds or securities and does not require prepayment of fees of more than \$1,200 per client, and six months or more in advance.

Business Continuity Plan

Overview

Invesco Ltd and its entity IAMD has a Business Continuity Program in place that provides a framework supporting detailed steps to mitigate and recover from the loss people, processes, and key assets. A disruptive event is classified as any event that materially limits the operations of Invesco thereof by denying critical infrastructure or business processes. The declaration of a disruptive event is made by designated management on site, at the time, depending on the nature of the event.

Business Continuity is a company-wide approach designed to ensure that critical processes can be maintained in the event of a major internal or external incident. Business Continuity is a standing department within Invesco and its personnel are dedicated full-time to delivering Invesco's business continuity goals.

Invesco has established recovery teams that cover all business and organizational areas within the company. Each team has responsibilities when it comes to Business Continuity:

To participate in Business Continuity plan exercises and maintenance procedures.

To understand and be able to follow the Business Continuity plan in times of disaster.

For IT Services teams, to provide the technology needed to support a recovery effort.

Major components of disaster recovery/ Business Continuity planning include:

- Incident notification procedures
- Status Line and Website
- Recovery Plans
- Recovery Facilities
- Pandemic Planning
- Planning measures including IT Systems and Data backups
- Recovery Exercises

Security Controls Systems

Information Security

Invesco Ltd ("Invesco") and its entity IAMD have established a Global Security Department to bring physical security and information security together under a single executive with responsibility for both disciplines supported by an intelligence function that would provide timely information about threats to all assets, whether data, systems, facilities, global workforce, and/or the brand itself.

The Information Security program within the Global Security Department is staffed with a designated Chief Information Security Officer who leads dedicated teams of information security and IT security operations professionals with responsibility for overseeing and maintaining all aspects of information security risk globally on a 24*7*365 basis. The program includes the development and implementation of information security policies aligned with industry guidelines (ISO27001/2, NIST) and all applicable statutes, rules or regulations, and includes commercially reasonable administrative, physical and technical safeguards to:

- Protect the privacy, confidentiality, integrity and availability of information assets and the systems that process those assets;
- Protect those assets against accidental, unlawful or unauthorized access; and
- Prevent the damage, destruction, or unauthorized disclosure, distribution, loss, manipulation, modification, and/or transmission of those assets.

Invesco's Information Security program is subject to regular independent assessments, audits, and reviews to evaluate effectiveness and compliance with relevant regulation and legislation relating to the safeguard of investor and employee sensitive information.

Policies

Invesco and its entity IAMD have a well-defined set of information security policies in place addressing areas:

- Information Security
- Risk Assessment
- Acceptable Use
- Physical Security

- Human Resources Security
- Access Control
- Asset Management
- Information Security Incident Management
- Communications & Operations Management
- Business Continuity Management
- Information Systems Acquisition, Development & Maintenance
- Operational Resilience
- Privacy
- Cyber Incident Management and Response

These securities policies aligning with the ISO 27001/2 framework have been developed, reviewed, and approved to ensure appropriate management of identified risks, alignment with regulatory and industry guidelines, and support Invesco's business.

Glossary of Terms

IAMD	Invesco Asset Management Deutschland GmbH
Invesco	Invesco Limited
IRE	Invesco Real Estate
ISSM	Invesco Senior Secured Management, Inc.
SEC	Securities and Exchange Commission, the US regulator
UCITS	Undertakings for Collective Investment in Transferable Securities

Brochure Supplement (Part 2B of Form ADV)

Education and Business Standards

Generally, Invesco would expect its investment professionals to be educated to a first degree standard or to hold a German University degree. In rare exceptions a business-related education of a sufficient length and appropriate experience will be accepted. Invesco requires that advisors it employs have a bachelor's degree and further coursework demonstrating appropriate knowledge. Examples of acceptable

coursework include: an MBA, a CFP®, a CFA, a ChFC, JD, CTFA, PhD or CPA.

Professional Certifications

Employees have earned certifications and credentials that are required to be explained in further detail.

Certified Financial Planner (CFP): Certified Financial Planners are licensed by the CFP Board to use the CFP mark. CFP certification requirements:

- Bachelor's degree from an accredited college or university.
- Completion of the financial planning education requirements set by the CFP Board (www.cfp.net).
- Successful completion of the 10-hour CFP® Certification Exam.
- Three-year qualifying full-time work experience.
- Successfully pass the Candidate Fitness Standards and background check.

Chartered Financial Analyst (CFA): Chartered Financial Analysts are licensed by the CFA Institute to use the CFA mark. CFA certification requirements:

- Hold a bachelor's degree from an accredited institution or have equivalent education or work experience.
- Successful completion of all three exam levels of the CFA Program.
- Have 48 months of acceptable professional work experience in the investment decision-making process.
- Fulfil society requirements, which vary by society. Unless you are upgrading from affiliate membership, all societies require two sponsor statements as part of each application; these are submitted online by your sponsors.
- Agree to adhere to and sign the Member's Agreement, a Professional Conduct Statement, and any additional documentation requested by CFA Institute.

Bernhard Langer, CFA

Year of birth: 1964

Educational Background:

- M.A. Business Administration, Economics & Banking, University Munich

Business Experience:

- Bayerische Vereinsbank 1989 – 1994

- Invesco since 1994

Disciplinary Information: n.a.

Other Business Activities: none

Additional Compensation: None

Bernhard Langer is supervised by Scott Wolle, Head, Systematic & Factor Investing. He reviews Bernhard's work through frequent office interactions as well as remote interactions. Scott Wolle contact information:

scott.wolle@invesco.com +1 (404) 439-3064

Uwe Draeger

- Year of birth: 1964

Educational Background:

- "Diplom-Ökonom", Hochschule für Ökonomie Berlin
- Master of Arts, City of London Polytechnic
- Master of Business Administration, Anglia Business School Cambridge

Business Experience:

- Barra 1995 - 2000
- Metzler 2000 – 2005
- Invesco since 2005

Disciplinary Information: n.a.

Other Business Activities: None

Additional Compensation: None

Supervision:

Uwe Draeger, Director Investment Office, is supervised by Bernhard Langer, CIO-IQS. He reviews Uwe's work through frequent office interactions as well as remote interactions. Bernhard's contact information:

Bernhard.Langer@fra.invesco.com
+49-69-29807310

Michael Fraikin

- Year of birth: 1967

Educational Background:

- M.S. Accounting & Finance, London School of Economics
- Bachelor of Arts, Combined European program, University Reutlingen/Middlesex University, London

Business Experience:

- Commerzbank 1991 – 1997

- Invesco since 1997

Disciplinary Information: n.a.

Other Business Activities: None

Additional Compensation: None

Supervision:

Michael Fraikin is supervised by Bernhard Langer, Chief Investment Officer. He reviews Michael's work through frequent office interactions as well as remote interactions.

Bernhard's contact information:

Bernhard.Langer@fra.invesco.com

+49-69-29807310

Alexander Uhlmann, CFA

- Year of birth: 1973

Educational Background:

- "Diplom Betriebswirt (FH)", Frankfurt School of Finance & Mgmt.

Business Experience:

- Dresdner Bank 1995 - 1997
- Invesco since 1997

Disciplinary Information: n.a.

Other Business Activities: None

Additional Compensation: None

Supervision:

Alexander Uhlmann is supervised by Bernhard Langer, Chief Investment Officer. He reviews Alexander's work through office interactions as well as frequent remote interactions.

Bernhard's contact information:

bernhard.langer@fra.invesco.com

+49 69 29 807 310

Nils Huter, CFA

Year of birth: 1981

Educational Background:

- Business Administration Degree (Diplomkaufmann, FH), University of Applied Sciences and Arts in Hildesheim.
- CFA Charterholder.

Business Experience:

- Portfolio Manager at Universal Investment GmbH Frankfurt 2006-2008
- Portfolio Manager at Invesco 2008-2018
- Head of the Frankfurt based Portfolio Construction and Trading Team 2008 onwards

Disciplinary Information: n/a

Other Business Activities if any : n/a

Additional Compensation if any: n/a

Reports into:

Reports to Glen Murphy/Bernhard Langer/Scott Wolle/Greg McGreevey