



Key Information Document

Purpose

This document provides you with key information about this investment product. It is not marketing material. The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this product and to help you compare it with other products.

Product

LUCELEN - FLEXIBLE a sub-fund of LUCELEN

class A - LU2041695433

This product is authorised in Luxembourg.

Manufacturer

Name: LUCELEN

Contact details:

14, Boulevard Royal L-2449 Luxembourg
www.vam.lu - Call (+352) 26 73 08 1 for more information.

Competent Authority:

The Commission de Surveillance du Secteur Financier is responsible for supervising the manufacturer in relation to this Key Information Document.

Management company

Victory Asset Management S.A. is authorised in Luxembourg and regulated by the Commission de Surveillance du Secteur Financier.

Date of production

01/01/2023

What is this product?

Type

This product is a share of an investment company qualifying as an undertaking for collective investment in transferable securities (UCITS).

Term

This sub-fund has no maturity date. However, the manufacturer may decide to close the sub-fund under certain circumstances.

Objectives

Preserving invested capital while seeking a positive absolute return through a diversified and mixed portfolio. The sub-fund will invest, without any sectorial, geographical or rating restrictions mainly in:

- equities and/or equity-linked securities;
- debt instruments and convertible bonds;
- money market instruments.

The sub-fund may invest up to 5% of its net assets in contingent convertible bonds. A maximum of 10% of the net assets may be invested in open-ended investment funds. Depending on market conditions, the sub-fund may hold liquid assets such as cash and/or equivalent assets.

The sub-fund may also use derivative products for hedging purposes or in order to optimize the portfolio's exposure.

Benchmark: The portfolio is actively managed on a discretionary basis without reference to a benchmark.

Intended retail investor

This product is designed for investors who are willing to achieve income and capital growth and have a medium to long term horizon. The investor can bear losses up to the invested amount. This product is appropriate for investors with a basic to advanced knowledge and experience of the product and the markets.

Other information

Depositary: Banque de Luxembourg

Dividend income: This class is a capitalisation class meaning that income is reinvested.

Conversion right: The investor has the right to convert his investment in shares in one sub-fund for shares in the same sub-fund or in another sub-fund. The investor can obtain information about how to convert in the prospectus of the fund.

Segregation: The assets and liabilities of a sub-fund are segregated pursuant to the law so that the commitments and liabilities of one sub-fund do not affect the other sub-funds.

Additional information: Additional information about the fund, copies of its prospectus, the latest annual and semi-annual report and the latest prices of shares may be obtained free of charge from the management company or on www.vam.lu. The prospectus and the periodic reports are prepared for the entire fund and are available in English. The management company may inform you about other languages in which these documents are available.

This sub-fund was launched in 2019 and this share class in 2019.

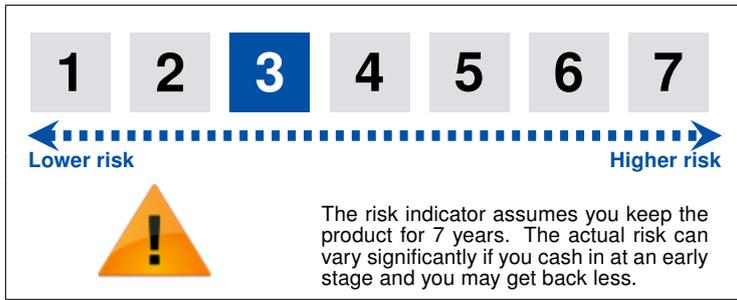
The currency of the share class is expressed in EUR.

Additional information for investors in Switzerland

The articles of association, the prospectus for Switzerland and the key information document, as well as the annual and semi-annual reports can be obtained free of charge from the representative in Switzerland: Waystone Fund Services (Switzerland) SA, av. Villamont 17, 1005 Lausanne, Switzerland, www.waystone.com. The paying agent in Switzerland is Helvetische Bank AG, Seefeldstrasse 215, 8008 Zurich, Switzerland. The latest prices of the shares are available at www.fundinfo.com. For shares distributed in Switzerland, the place of performance and jurisdiction are located at the registered office of the representative. The risk indicator and the performance scenarios were calculated and presented in accordance with the regulations of the fund's home country.

What are the risks and what could I get in return?

Risk indicator



The summary risk indicator is a guide to the level of risk of this product compared to other products. It shows how likely it is that the product will lose money because of movements in the markets or because we are not able to pay you.

We have classified this product as 3 out of 7, which is a medium-low risk class. This rates the potential losses from future performance at a medium-low level, and poor market conditions are unlikely to impact our capacity to pay you.

Be aware of currency risk. You may receive payments in a currency that differs from your reference currency, so the final return you will get depends on the exchange rate between the two currencies. This risk is not considered in the indicator shown above.

The sub-fund is also exposed to the following materially relevant risks that are not included in the summary risk indicator: Operational risk, political and legal risks.

This product does not include any protection from future market performance so you could lose some or all of your investment.

If we are not able to pay you what is owed, you could lose your entire investment.

Performance scenarios

Recommended holding period: 7 years

Example investment: 10.000 EUR

| | | If you exit after 1 year | If you exit after 7 years (recommended holding period) |
|---------------------|--|-------------------------------------|---|
| Scenarios | | | |
| Minimum | There is no minimum guaranteed return. You could lose some or all of your investment. | | |
| Stress | What you might get back after costs | 4.530 EUR | 4.150 EUR |
| | Average return each year | -54,7 % | -11,8 % |
| Unfavourable | What you might get back after costs | 7.390 EUR | 4.150 EUR |
| | Average return each year | -26,1 % | -11,8 % |
| Moderate | What you might get back after costs | 10.460 EUR | 13.550 EUR |
| | Average return each year | 4,6 % | 4,4 % |
| Favourable | What you might get back after costs | 11.600 EUR | 14.500 EUR |
| | Average return each year | 16,0 % | 5,4 % |

The figures shown include all the costs of the product itself, but may not include all the costs that you pay to your advisor or distributor. The figures do not take into account your personal tax situation, which may also affect how much you get back.

What you will get from this product depends on future market performance. Market developments in the future are uncertain and cannot be accurately predicted.

The unfavourable, moderate, and favourable scenarios shown are illustrations using the worst, average, and best performance of the product and of a suitable benchmark over the last 12 years. Markets could develop very differently in the

future.

This type of scenario occurred for an investment between 2010 and 2022, by referring to a benchmark between 2010 and 2019.

The stress scenario shows what you might get back in extreme market circumstances.

What happens if LUCELEN is unable to pay out?

If we are not able to pay you out what we owe you, you are not covered by any national compensation or guarantee scheme. To protect you, the assets are held with a separate company, the depositary Banque de Luxembourg. Should we default, the investments are liquidated and the proceeds are distributed to the investors. In the worst case, however, you could lose your entire investment.

What are the costs?

The person advising on or selling you this product may charge you other costs. If so, this person will provide you with information about these costs and how they affect your investment.

Costs over time

The tables show the amounts that are taken from your investment to cover different types of costs. These amounts depend on how much you invest, how long you hold the product and how well the product does. The amounts shown here are illustrations based on an example investment amount and different possible investment periods.

We have assumed:

- In the first year you would get back the amount that you invested (0% annual return). For the other holding period we have assumed the product performs as shown in the moderate scenario
- 10.000 EUR is invested

| | If you exit after 1 year | If you exit after 7 years |
|------------------------|--------------------------|---------------------------|
| Total costs | 350 EUR | 2.600 EUR |
| Annual cost impact (*) | 3,5 % | 2,6 % each year |

(*) This illustrates how costs reduce your return each year over the holding period. For example it shows that if you exit at the recommended holding period your average return per year is projected to be 7,1% before costs and 4,4% after costs.

We may share part of the costs with the person selling you the product to cover the services they provide to you. They will inform you of the amount.

Composition of costs

| One-off costs upon entry or exit | | If you exit after 1 year |
|--|--|--------------------------|
| Entry costs | 1,0% of the amount you pay in when entering this investment. | 100 EUR |
| Exit costs | We do not charge an exit fee for this product. | 0 EUR |
| Ongoing costs taken each year | | |
| Management fees and other administrative or operating costs | 1,5% of the value of your investment per year. This is an estimate based on actual costs over the last year. | 150 EUR |
| Transaction costs | 0,3% of the value of your investment per year. This is an estimate of the costs incurred when we buy and sell the underlying investments for the product. The actual amount will vary depending on how much we buy and sell. | 30 EUR |
| Incidental costs taken under specific conditions | | |
| Performance fees | 10% a year of any positive NAV variation with application of a High-Water Mark. The actual amount will vary depending on how well your investment performs. The aggregated cost estimation above includes the average over the last 5 years. | 70 EUR |

The conversion of part or all of the shares is free of charge.

How long should I hold it and can I take money out early?

Recommended holding period: 7 years

You should be prepared to stay invested for 7 years. However, you can redeem your investment without penalty at any time during this time, or hold the investment longer. Redemptions are possible on each full bank business day in Luxembourg. In exceptional circumstances, your right to request the redemption of your investment may be limited or suspended.

How can I complain?

If you have any complaints about the product, the conduct of the manufacturer or the person that advised on or sold this product, you can use different communication channels: by e-mail to info@victory-am.lu, by letter to 1 rue Peternelchen L-2370 Howald, Luxembourg, by phone calling the number (+352) 26 73 08 1.

In all cases, the complainant must clearly indicate his/her contact details (name, address, phone number or email address) and provide a brief explanation of the claim. More information is available on our website www.vam.lu.

Other relevant information

The issuing document of the product, the latest version of the Key Information Document as well as the latest annual and semi-annual report, may be obtained free of charge on www.vam.lu.

Past performance and previous performance scenarios: Historical returns for the last 6 years and previously published performance scenarios, updated on a monthly basis, are available on <https://www.yourpriips.eu/site/71540/en-CH>.