

Voluntary Pension Fund Dovere

Statement of Investment Policy

***This document represents a translation from the original Bulgarian version and is for information purposes only. In case of divergence the Bulgarian original shall prevail.**

I. INVESTMENT POLICY AND INVESTMENT ACTIVITY FRAMEWORK

1. Levels of responsibility and the investment decision-making process:

a) investment decision-making process, approval and documenting the investment decisions, including the persons responsible for the preparation of the investment proposals and the investment analysis:

The investment proposals regarding the asset investment of the Voluntary Pension Fund Doverie, prepared pursuant to the laws regulating the supplementary pension insurance funds (SPIF) industry and within the framework of the investment policy statement of the Voluntary Pension Fund Doverie approved by the Managing Board for the relevant periods, are subject to review by the Investment Committee (IC) which has a support function to both the Supervisory Board and the Managing Board of the Pension Assurance Company Doverie AD.

The investment proposals are prepared in writing, saved electronically by the investment consultant, the portfolio managers and/or the financial analysts of the company and depending on the nature of the proposal should incorporate the information provided for in the Organizational Rules of the Investment Committee to the Pension Assurance Company Doverie.

The decisions on approval (in whole or in part) or refusal to conclude transactions in connection with the investment proposals under consideration are taken by the members of the Investment Committee, in accordance with the Organizational Rules of the Investment Committee to Pension Assurance Company Doverie AD. The investments proposals regarding investment properties are subject to approval by the Investment Committee, and once passed, are subject to further approval by the Managing Board of the Pension Assurance Company Doverie AD. The composition, structure and the Organizational Rules of the Investment Committee are determined by the Supervisory Board of the Pension Assurance Company Doverie AD.

b) control over the execution, people in charge of such control and their roles and responsibilities:

Prior to the execution of any investment transaction, there is a double check procedure by the portfolio managers and/or the financial analysts regarding the full compliance with all internal and external rules and regulations regarding the supplementary pension insurance Industry. Further monitoring and control for the compliance of the investment portfolios structure with the investment qualitative and quantitative limits is performed on a daily basis by the portfolio managers and the investment analysts to make sure the investments are kept within the internal and

regulatory limits. The responsibility for the legal and regulatory compliance of the investment proposals with the applicable internal and external rules and regulations lays on the portfolio managers and/or the investment analysts of the company.

Post-execution control of the investment decisions is performed by the following units and persons within the scope of their competence: the Investment Committee of Pension Assurance Company Doverie AD by reviewing the execution of the already taken investment decisions; the Risk Management Department by reviewing the execution of the already taken investment decisions; the Internal Control Department by reviewing the execution of the already taken investment decisions; the Chairperson of the Managing Board and the Executive Directors of the company.

The decision-making and approval procedure regarding the investment proposals for investing the assets of the Voluntary Pension Fund Doverie, as well as the control over the execution process and the people in charge of the control function are detailed in The Internal Rules and Regulations of Pension Assurance Company Doverie AD on Investment Decision Making and the Technical Execution Thereof.

2. Investment risk and return indicators, including methods and frequency of their calculation.

The indicators used for assessment of the investment results are reviewed by the Investment Committee of Pension Assurance Company Doverie AD once every six months.

Besides the indicators described below, Pension Assurance Company Doverie AD also calculates the real return according to the method of the Internal Rate of Return, outlined in Part II, item 3 hereof.

a) return

PENSION ASSURANCE COMPANY Doverie AD calculates the nominal return according to the methodology outlined in items 1 -3 of Regulation No 61 dated 27.09.2018 on the requirements regarding the advertisement and written information materials and the webpages of the pension insurance companies.

b) risk

The investment risk of the portfolio of the Voluntary Pension Fund Doverie is measured by the historical volatility captured in the standard deviation of the return according to the methodology outlined in items 4 - 7 of Annex No 15 to Regulation No 61 dated 27.09.2018 on the requirements regarding the advertisement and written information materials and the webpages of the pension insurance companies.

c) risk-adjusted return

Pension Assurance Company Doverie AD determines the risk-adjusted return of the Voluntary Pension Fund Doverie through the Sharp ratio, calculated according to the methodology outlined in items 8 - 9 of Annex No 15 to Regulation No 61 dated 27.09.2018 on the requirements regarding the advertisement and written information materials and the webpages of the pension insurance companies.

3. Rules on the execution of the investment transactions, including limitation of the excessive portfolio turnover

The execution of the investment transactions is performed in line with the Internal Rules and Regulations of Pension Assurance Company Doverie AD for investment decision-making and their technical execution and in compliance with the laws. Upon concluding transactions the portfolio managers and/or the financial analysts must take good care to optimize the total trade volume and to aggregate trade packages in order to reduce the transaction costs paid to the investment firms. This way the excess portfolio turnover will be limited. Increases turnover is allowed in case risky exposures are closed and/or positive returns are realized, which exceed by far the transaction costs.

4. Rules on determination and monitoring of the current liquidity needs of the Voluntary Pension Fund Doverie

The current liquidity needs are determined on a monthly basis on the grounds of the expected cash inflows and outflows related to the investment business of Voluntary Pension Fund Doverie, the possible changes of the legal framework, as well as the expected payments to the fund beneficiaries, pensioners and their heirs.

5. Measures provided for by Pension Assurance Company Doverie in order to prevent conflicts of interests upon investing the assets of the Voluntary Pension Fund Doverie, the persons in charge thereof and their duties in this regard

In order to prevent conflicts of interest upon investing the assets of Voluntary Pension Fund Doverie the Pension Assurance Company Doverie adopts rules on the detection and prevention of conflicts of interest pursuant to article 123f, paragraph 4, item 6, letter 'h' of the Social Security Code (SSC), as well rules on the personal transactions with financial instruments pursuant to article 123f, paragraph 4, item 6, letter 'f' of the SSC.

6. Policy followed by Pension Assurance Company Doverie AD upon exercise of the rights of Voluntary Pension Fund Doverie as owner of the securities

Pension Assurance Company Doverie AD in its role as a company managing the assets of Voluntary Pension Fund Doverie exercises all legal and contractual rights granted to the Voluntary Pension Fund Doverie in its role as owner of the securities thus protecting the interests of the fund beneficiaries. Representatives of Voluntary Pension Fund Doverie have the right to participate in shareholder's and bondholder's meetings of the issuers and to vote at these meeting only in the interest of Voluntary Pension Fund Doverie beneficiaries taking into account both the immediate effects as well as the future effects.

7. Investment results – intervals of disclosure and method of presentation

Subsequent valuation of the assets and liabilities of the Voluntary Pension Fund Doverie is performed on a daily basis according to the approved Rules on the valuation of the assets and the liabilities of Pension Assurance Company Doverie AD and the supplementary pension insurance funds managed thereof, approved by the Managing board of the Pension Assurance Company Doverie AD. The value of one share of the Voluntary Pension Fund Doverie is calculated on a daily basis and is published on the webpage of the Pension Assurance Company Doverie AD and on the webpage of the Financial Supervision Commission.

Pension Assurance Company Doverie AD discloses to the public data presenting either directly or indirectly the investment results of the Voluntary Pension Fund Doverie pursuant to Regulation No 61 dated 27.09.2018 on the requirements regarding the advertisement and written information materials and the webpages of the pension insurance companies.

II. DEFINITION OF THE INVESTMENT OBJECTIVES

1. Return objectives:

The main objective of the investment policy of Voluntary Pension Fund Doverie is to preserve and to achieve substantial real growth of the individual savings of the fund beneficiaries and pensioners on the middle and long run through achieving the highest possible rate of return while assuming moderate to moderate high risk exposure.

2. Risk objectives:

The Voluntary Pension Fund Doverie shall achieve its investment objective by following a balanced investment portfolio and undertaking moderate to moderate high risk.

a) time horizon restrictions:

Since the liabilities of Voluntary Pension Fund Doverie are relatively long-term, the time horizon of the portfolio is relatively long – 10 to 20 years.

b) liquidity requirements:

The long-term character of the savings in the Voluntary Pension Fund Doverie, the increasing number of fund members, the increasing pension fund contributions and the low average age, on the one hand, as well as the relatively larger number of occasions leading to withdrawal of the accumulated resources, on the other hand, lead to relatively similar amounts of the cash inflows into the Voluntary Pension Fund Doverie compared to the outflows and therefore to higher level of liquidity needs.

c) other limitations:

Investment returns on the portfolio of Voluntary Pension Fund Doverie are exempt from corporate taxes and the return distributed to member accounts is exempt from income tax.

3. Criteria for achievement of the investment policy objective. Comparison indicator for the investment policy results

The objective upon managing the supplementary pension savings of the fund members is to preserve and to increase their purchasing power in a long run. The indicator for preserving the purchasing power of the savings managed by the Voluntary Pension Fund Doverie is considered the Real Return in percentage points of the assets managed by the fund using the method of the internal rate of return (money weighted rate of return). The calculation for the period under review is done on a monthly basis. The aim is to reach a positive real rate of return of 0,5% on an annual basis averaged over the previous 5-year period.

Calculating the Real Rate of Return is done as follows:

- n – number of months in the period under review
- A₀ – net assets of the fund at the beginning of the period;
- A_n - net assets of the fund at the end of the period;
- I₀ – CPI for the month before the first month of the period under review;
- I_i – CPI of month i, where $1 \leq i \leq n-1$
- I_n – CPI of the last month of the period under review;
- F_i – Net cash inflow for month i, where $F_i = G_i - M_i - N_i$, for $i: 1 \leq i \leq n-1$;
- G_i – gross amount of member contributions for month i, including transferred contribution from other pension funds;
- M_i – paid amount to members for month i, including transferred contributions to other pension funds;
- N_i – charged and paid fees to Pension Assurance Company Doverie AD for the contributions in month i;
- F₀ = A₀ and
- F_n = -A_n + G_n - M_n - N_n
- R_r – annual average real rate of return for the period, based on the following equation:

$$0 = \sum_{i=0}^n \frac{F_i * \left(\frac{I_n}{I_i}\right)}{(1 + R_r)^{\left(\frac{d_i}{365}\right)}}$$

where d_i is the number of days from the beginning of the period under review till the last day of month i of the period, where d₀ = 0.

III. DESCRIPTION OF THE INVESTMENT POLICY TO ACHIEVE THE INVESTMENT OBJECTIVES

1. Investment policy rationale - determinant factors and circumstances:

The Statement of Investment Policy is consistent with the specifics and requirements for doing supplementary pension insurance business in Bulgaria.

The complexities of the portfolio management of the Voluntary Pension Fund Doverie increase the importance of elaborating a well-defined and effective investment policy that clearly defines the investment objectives and constraints.

2. Specific requirements regarding asset classes characteristics

The Managing board of the Pension Assurance Company Doverie AD approves a list of the specific characteristics of the asset classes in which the Voluntary Pension Fund Doverie invests – Annex No 1 to this policy being integral part thereof.

3. Types of investments:

a) legally approved investment instruments, and quantitative limitations by classes and types of assets

The Managing board of the Pension Assurance Company Doverie AD approves a list of the legally allowed investment instruments, and the quantity limitations by classes and types of assets which apply to the investments of the Voluntary Pension Fund Doverie - Annex No 2 to this policy being integral part thereof

b) geographical regions and market allocation in compliance with the legal constraints:

The portfolio allocation by geographical regions and markets is a part of the diversification policy of the Voluntary Pension Fund Doverie, aiming to achieve an optimal ratio between risk and return. Its implementation is regulated by Regulation No 29 on the minimum level of bank credit ratings and the definition of the countries, the international financial organizations, the markets and their indexes pursuant to article 176 of the Social Insurance Code. Depending on the market environment and development prospects, investment can be allocated to each of the legally approved geographical regions and markets.

c) sector diversification:

Considering the economic cycles and the general and systematic risks the Voluntary Pension Fund Doverie strives to invest its funds in the economic sectors that are expected to generate highest rates of return. Due to the dynamic market environment, sector limitations or restrictions do not apply. The major economic sectors are:

- Energy
- Materials
- Industry
- Consumer Staples
- Consumer Discretionary
- Health Care
- Financials

- IT
- Telecommunication
- Utilities

4. Investment restrictions and limitations to be observed upon investment of the funds of the Voluntary Pension Fund Doverie,

The investment restrictions and limitations that apply to the investments of the Voluntary Pension Fund Doverie are legally determined and summarized in Annex No 2 to this Statement of Investment Policy.

The assets of the Voluntary Pension Fund Doverie may not be invested in:

1. Financial instruments issued by the Pension Assurance Company Doverie AD or its related parties;
2. Financial instruments issued by fund's custodian bank or by parties in close relationship with the bank;
3. Deposits in a bank which is related party to the Pension Assurance Company Doverie AD;
4. Shares and/or interest in a collective investment scheme under article 176, paragraph 1, item 12 of the Social Security Code and in an alternative investment fund article 176, paragraph 1, item 13 of the Social Security Code, managed by a party related to the Pension Assurance Company Doverie AD;
5. Financial instruments that are not fully paid up.

5. Target strategic allocation of fund's asset, minimum and maximum deviation limits:

The target strategic asset allocation of the portfolio of the Voluntary Pension Fund Doverie weights the individual asset classes that, considering the return and volatility expectations for each one of them, would be most appropriate for achieving the fund's investment objective. The asset class allocation provides diversification and optimizes the risk/return ratio. The selection of each specific financial instrument depends on the market conditions, its unique characteristics, and the expected contribution of the relevant instrument to the structure, risk, and return of the investment portfolio.

Deviations from the strategic target asset allocation at any time may come as a result of the proactive portfolio management in the context of the market environment and the attractiveness of the different classes of investment instruments, of significant deviations in the market prices of the investment portfolio and/or of the change in the cash funds of the Voluntary Pension Fund Doverie as a result of significant cash inflows of outflows related to its operations.

The target strategic asset allocation and the minimum and maximum deviation limits are outlined in Appendix №3, which is an integral part of the Investment Policy Statement.

6. Diversification of the portfolio by classes of asset

The instruments Voluntary Pension Fund Doverie invests in are selected so that the investment portfolio is diversified and protected to the maximal extent against adverse price fluctuations on the financial markets and significant exposures to individual market sector, geographical region, economic sector, a single company, or securities issue.

7. Specific investment strategies and styles

The investment portfolio of Voluntary Pension Fund Doverie is actively managed, as its structure is subject to changes depending on the market environment and the relative attractiveness of the different types of asset classes. Due to markets dynamics no style restrictions or limitations apply.

8. Investments in collective investment schemes and alternative investment funds

The main purpose of investing in collective investment schemes (CIS) is to achieve higher degree of diversification and to improve the liquidity while optimizing the costs of the Voluntary Pension Fund Doverie. In CIS selection process, a set of criteria is considered, including: portfolio diversification, risks related to the specific investment goal, historical performance relative to the benchmark specific for the relevant CIS, credit and reputation risk of the company managing the CIS, liquidity, and CIS management costs.

9. Investment in investment properties

The main purpose of investing in investment properties is to achieve higher degree of diversification and growth of fund's investment results. The proposals for transactions with investment properties are prepared by a person with the required knowledge, background and qualification regarding the investments in and the management of real estate properties.

10. Repo and reverse repo transactions

Should the capital markets environment is favourable, Pension Assurance Company Doverie AD intends to enter into repo transactions using the funds of the Voluntary Pension Fund Doverie in case of fast liquidity needs, and into reverse repo transactions, respectively, with a view to increase fund's return. The counterparty under a repo transaction may only be a bank or investment firm, holding an owner's equity of at least 1 500 000 levs, that is licensed to do business pursuant to the laws of the member – state or otherwise is subject to supervision by a competent body of another state – party to the Convention on the Organization for economic cooperation and development.

11. Maximal amount of the fund's liquidity resources as a percentage of its assets

Pension Assurance Company Doverie AD analyzes the liquidity needs of Voluntary Pension Fund Doverie based on the historical cash inflows and outflows and monthly forecast of the cash flows related to its business. Based on such analysis the Voluntary Pension Fund Doverie sets a minimal and maximal threshold of the cash and

cash equivalents in the portfolio of the Voluntary Pension Fund Doverie.

Fluctuations between the minimal and maximal threshold for cash and cash equivalents outlined in Annex No 3 to the Statement of Investment Policy, is permissible at any time and can come as a result of the active portfolio management in the context of the market environment and the relative attractiveness of the different classes of financial instruments as at the specific time.

IV. INVESTMENT RISKS AND RISK MANAGEMENT

1. Identification of the investment risks.

Pension Assurance Company Doverie AD identifies, measures and monitors all investment risks, associated with the company business and the various types of securities in the portfolios of the Voluntary Pension Fund Doverie managed thereof, namely:

1) Market risk - the risk to generate losses due to adverse changes in the prices of the securities, market interest rates, exchange rates and other. The major types of market risk are:

a) Interest rate risk - the risk of decrease of the investment value of a given security due to change in the level of the interest rates.

b) Exchange rate risk - the risk of decrease of the investment value of a given security or deposit, denominated in a currency, different from Lev and Euro, due to exchange rate fluctuations between that currency and the Lev or the Euro.

c) Price risk, associated with the investments in shares or other equity securities - the risk of decrease of the investment value of a given security in case of adverse changes in the levels of the market prices.

d) Price risk, associated with the investments in investment property - the risk of decrease of the investment value of investment property due to adverse changes in the levels of the market prices.

2) Credit risk is generally the risk of decrease of the investment value of a given security due to unexpected credit events, related to the issuers of financial instruments, the counterparty to exchange and over-the-counter transactions, as well as unexpected events occurred in the countries in which they operate. Pension Assurance Company Doverie AD identifies three main types of credit risk:

a) Counterparty risk - the risk of non-performance of the counterparty's obligation on over-the-counter transactions, such as forward exchange contracts, interest swap contracts, trade in over-the-counter options etc.

b) Settlement risk - the risk for the Voluntary Pension Fund Doverie arising out from the possibility not to receive cash or financial instruments from counterparty on the settlement date, after the Fund had fulfilled its obligations on certain transactions.

c) Investment credit risk - the risk of decrease of the investment value of certain debt securities due to a credit event with the issuer of this instrument. Credit event shall include filing for bankruptcy, insolvency, significant change in the capital structure, credit rating downgrade etc.

3) **Concentration risk** – the risk of loss due to inadequate diversification of exposures to the same issuer, companies of the same group and person being in close relations with them, to the same industry or geographic region.

4) **Liquidity risk** - the risk of losses caused by urgent sales of assets at unfavourable market conditions to meet unexpected short-term liabilities or the inability to buy/sell certain asset due to lack of supply/demand.

5) **Legal and regulatory risk**, related to amendments of the laws regulating the investment activity that may lead to compulsory sales of assets or to changes in the assessment methods thus resulting in decrease of investment's value.

6) **Political risk**, arising out from political turmoil in the country of the investment, resulting in worse market and investment environment and relevant decrease of investment's value.

7) **Risks, relevant to the hedging instruments**

a) Market risk of the hedging instruments is the risk of change of the hedging instruments value, resulting from changes in the interest rates, the prices of the underlying securities, indices or foreign exchange rates. The market risk of the hedging instruments is considered on a portfolio basis, taking into account the investment position being hedged.

b) Credit risk is the risk of potential failure of the counterparty to a hedging transaction to fulfil their obligation on the settlement date of the forward exchange contract or the interest rate swap contract or the over-the-counter traded option;

c) Liquidity risk is the risk for the Voluntary Pension Fund Dovere to be unable to take or to liquidate a hedging position, without significant adverse impact on the value of the hedging instrument.

d) Basis risk in futures contracts - it occurs when the characteristics of the futures contract being hedged differ from those of the position being hedged. Basis risk is the uncertainty whether or not the spread between the spot price and the futures price will increase or decrease during the period of the hedging contract.

e) Risk related to the possibility for the hedging instrument to stop performing its intended purpose to reduce the investment risk associated with the relevant asset.

8) **Other risks relevant to investments**

a) The risk of decrease of the investment value, due to adversely influence of factors

from ecological, social and management character, origin from the issuers activities (ESG risks).

- b) Risk for compulsory sale of investment property, owned by the fund, due to insufficient return of the investment property in comparison to the normative level, according to article 180 c, paragraph 2 of the Social Security Code

2. Methods of Risk assessment of the portfolio and the risk for the individual portfolio assets

1) Pension Assurance Company Doverie AD measures the interest rate risk of the assets through the duration method, which is the main measure for interest rate sensitivity of a particular security. Pension Assurance Company Doverie AD shall use the method of the modified duration to measure the interest rate risk, related to each security, based on an interest rate, such as bonds, interest rate swaps, futures, based on interest rates and futures, based on bonds.

2) Pension Assurance Company Doverie AD measures the exchange rate risk of the assets through quantifying the net exposure to each currency, different from Lev and Euro, as a percent of the total assets of the Voluntary Pension Fund Doverie.

3) Pension Assurance Company Doverie AD measures the price risk, associated with the investments in shares through one of the quantitative methods, applicable for the relevant securities market:

a) Historical volatility, measured by standard deviation;

b) β -coefficient to the indexes of the relevant market;

c) In case of impossibility to apply the methods detailed in items a) and b), Pension Assurance Company Doverie AD shall use standard deviation of the chosen index of the regulated market on which the particular shares are traded as a substitute in the complete analysis of the portfolios.

4) Pension Assurance Company Doverie AD measures the price risk, associated with the investments in real estate property by monitoring key parameters and trends on the real estate market in Bulgaria in all its segments. For the purpose of risk assessment, the Voluntary Pension Fund Doverie takes into account the specifics of each property it has invested in, analyzing the following factors:

a) type of the investment property;

b) stage of the life cycle of the property;

c) location of the property;

d) economic situation in the subsector, in which the property falls.

5) Pension Assurance Company Doverie AD measures the credit risk of a counterparty on a daily basis by calculating the value of the unrealised profit from the concluded forward exchange contract, interest rate swap contract or over-the-counter

traded options. The value of the unrealised profit equals the market value of the contract, if positive. In determining the value of the unrealised profit the fees and commissions paid on the conclusion of such transactions shall not be taken into account. Where the Voluntary Pension Fund Doverie holds hedging instruments on several transactions with one and the same counterparty, the value of the risk of default by the counterparty to these transactions equals the difference between unrealised profits and losses from all such transactions, provided that:

a) the transactions are concluded on the basis of a netting agreement with the counterparty;

b) the netting agreement under item a) provides for that in case of default, bankruptcy or liquidation of the counterparty to the transaction only one liability (in case of net negative market value) or one receivable (in case of net positive market value) of the Voluntary Pension Fund Doverie shall be assessed, whereby the receivables and liabilities subject of the netting agreement shall be deemed settled.

c) the insolvency of the counterparty is a ground for termination of the contract.

6) Pension Assurance Company Doverie AD measures the settlement risk by calculating the value of all unsettled transactions with the same counterparty as a percent of the assets. The transactions concluded under DVP settlement method (delivery versus payment) and on markets with functioning clearing mechanism, shall not be taken into account.

7) For the purpose of the investment credit risk assessment and management and taking investment decisions the Pension Assurance Company Doverie AD does not rely solely and automatically on credit ratings assigned by credit rating agencies under article 3, paragraph 1, letter b) of Regulation (EU) 1060/2009 of the European Parliament and of the Council of 16 September 2009 on the credit rating agencies (JO, L 302/1 of 17 November 2009).

Pension Assurance Company Doverie AD performs a qualitative and quantitative credit analysis based on:

a) The credit risk of the government securities is measured through data analysis at macro level (GDP, inflation, unemployment, Debt/GDP ratio etc.) of the relevant country;

b) The credit risk of the corporate, mortgage and municipal securities is measured by taking into account the trends for issuers' development, the reports of trustee banks of the bondholders, the status of the collateral etc. The financial status of those issuers is analyzed and the credit risk is assessed on a quarterly basis using in-house assessment methods;

c) The credit risk of the banks where Voluntary Pension Fund Doverie holds deposits is measured using some key financial measures for bank activities, accessible by public sources of information, that are analysed every quarter;

d) The credit risk of the repo transactions is measured on the grounds of analysis of

counterparty's financial position, the buffers in the repo transaction (margin call, hair cut etc.), as well as the quality of the underlying collateral subject to the repo transaction.

8) Pension Assurance Company Doverie AD manages the concentration risk of the Voluntary Pension Fund Doverie by the related weights of investments to one and the same issuer; to the companies of the same group and to the persons closely related to them; to the same industry or country;

9) Pension Assurance Company Doverie AD measures and analyzes the liquidity risk of the Voluntary Pension Fund Doverie on the base of the historical data for the cash inflows and outflows and the monthly forecast for the operating cash flows. Based on this analysis Pension Assurance Company Doverie AD sets a minimum threshold of cash and cash equivalents in the portfolio of Voluntary Pension Fund Doverie. The liquidity risk of specific securities and the other investments of Voluntary Pension Fund Doverie are also analyzed by monitoring the number of transactions and the volume of the traded securities.

10) Pension Assurance Company Doverie AD measures the legal and regulatory risk related to the investments of the Voluntary Pension Fund Doverie based on the analysis of the impact such legal amendments would have over the fund's investments.

11) Pension Assurance Company Doverie AD measures the political risk by monitoring and analyzing the political situation in issuer's country or the country where is situated issuer's registered office or the prevailing part of its activities.

12) Pension Assurance Company Doverie AD measures the market and credit risk of the hedging instruments by means of the following methods:

a) potential change of the value of the interest rate futures contracts – it is measured through the modified duration of the underlying asset (cheapest-to-deliver bond) on the maturity date of the futures contract;

b) The market risk of the futures, based on stock indices is measured through:

aa) historical volatility, measured by standard deviation:

bb) β of the futures contract.

c) the effect of the change of the price of the underlying asset on the value of the option is measured by "delta".

d) the effect of the change of the interest rates on the value of the interest rate swap contracts is measured through the duration of the swap contract.

e) the market risk of the forward exchange contracts is measured through the historical volatility of the basic exchange rate measured by the standard deviation.

f) the credit risk of the forward exchange contracts is measured through the value of the contract for Voluntary Pension Fund Doverie, in case it is positive.

g) the credit risk of the interest rate swaps is measured by the value of the contract for Voluntary Pension Fund Doverie, in case it is positive.

h) the credit risk of the over-the-counter traded options is measured through the option value, in case it is positive.

i) the hedging instruments (futures and options), traded on a regulated market are not exposed to credit risk because of the clearing house participation and the daily clearance of the margin accounts.

j) the liquidity risk of the futures and options traded on the stock exchange is analyzed by monitoring of the number of transactions and traded contracts. The liquidity risk of the forward exchange contracts, the interest rate futures contracts and the over-the-counter traded options is analyzed on the grounds of the possibility for the Voluntary Pension Fund Doverie to borrow or to close those hedging transactions and the impact this would have on the value of the hedging instrument.

k) The basic risk of the futures contracts is measured by means of the spread between the spot price and the futures price.

13) Pension Assurance Company Doverie AD measures and evaluate ESG risks for decrease of the investment value in financial instruments in cases, when there are available public accessible data for awarded ESG-ratings or other data from international acknowledged companies, specialised in the evaluation of the impact of ecological, social and management factors on financial stability of different countries or companies.

14) Pension Assurance Company Doverie AD evaluate the risk for compulsory sale of investment property in the fund's portfolio by comparison the net return of the investment property for 5 years period and one half of the fund's return for the same period, as the evaluation depend on level of the deviation.

3. Risk profile of the portfolio and risk tolerance

Pension Assurance Company Doverie AD maintains moderate to moderate high level of risk of the portfolio of the Voluntary Pension Fund Doverie, corresponding to its investment objectives of risk and return and a balanced risk profile.

4. Rules and procedures for monitoring, evaluation, and control of the investment risk, including techniques and strategies for risk management

1) The system for management of the risk related to the investments of Voluntary Pension Fund Doverie includes:

a) Risk Committee – advisory body to the Managing board charged with rights and duties determined by its rules of operation approved by the Managing board of

Pension Assurance Company Doverie AD.

- b) Risk Management Department under the direct supervision of the Managing Board, the functions and the duties of which comply with the requirements of the Social Security code, Regulation No 59 of 4 April 2018 of the Financial Supervision Commission on the functions and duties of the departments, units and the persons in charge of the risk management, internal control and internal audit in the pension insurance companies and the Internal rules on the procedures for monitoring, measuring and management of the risk related to the investments of the Pension Assurance Company Doverie AD and the funds managed thereof, composed by a head and by coworkers;
- c) The other organizational units and functions that have specific duties and roles in the risk management system related to the investments of the Pension Assurance Company Doverie AD and the funds managed thereof are:
 - aa) the Internal Control Department;
 - bb) the internal auditor.

2) The Risk Management Department identifies, measures, monitors and takes part in the management of the exposure of Voluntary Pension Fund Doverie to the risks, detailed in Part IV, item 1 both individually and at a portfolio level and coordinates and reports this exposure according to the requirements of the Social Insurance Code, the Statement of Investment Policy of the Voluntary Pension Fund Doverie, the Internal rules on the procedures for monitoring, measuring and management of the risk related to the investments of the Pension Assurance Company Doverie AD and the funds managed thereof and the market conditions.

3) The Risk Management Department assists the Managing board of Pension Assurance Company Doverie AD, the Risk Committee and the Investment Committee in the course of determination of the acceptable level of the risk upon investing the resources of Voluntary Pension Fund Doverie, takes part in the elaboration of the investment policy and other in-house documents that have material impact on the risk exposure of the Voluntary Pension Fund Doverie or prepares opinions thereupon.

4) The Risk Management Department keeps a Risk register.

5) The Risk Management Department prepares risk evaluation analyses and reports on risk assessment, proposals for internal limits and restrictions, limit thresholds with regard to the different risks in the course of the risk management and proposes measures for risk mitigation. The department prepares and proposes lists with counterparties for Investment Committee's approval.

6) The Risk Management Department issues written recommendations on the prevention or limitation of risks manifestation and the remedy of the effects of occurred adverse events and analyzes the efficiency of the undertaken steps regarding the risk management and monitors the implementation of those recommendations.

7) When the Risk Management Department makes an assessment that a certain market risk is above the tolerance level for this type of risk, corresponding to the risk level acceptable for the Voluntary Pension Fund Doverie, it reports to the Investment Committee, the Risk Committee and the Managing board of the Pension Assurance

Company Doverie AD. Following the report by the Risk Management Department and upon instructions by the Executive director supervising the Finance, Accounting and Investments Department the portfolio managers or the financial analysts prepare written proposal for mitigation of the relevant risk, including by means of hedging transaction(s), in line with the requirements of Regulation No 34 dated 04.10.2006 on the terms and conditions for conclusion transactions for mitigation of the investment risks related to the assets of supplementary pension insurance fund and on the requirements and limitations applicable to such transactions.

8) The Risk Management Department prepares reports on the risk and risk management on a monthly basis addressed to the Managing board, the Risk Committee and the Investment Committee.

9) The Risk Management Department presents to the Investment Committee analyses on the impact of the hedging transactions on the risk profile of Voluntary Pension Fund Doverie portfolio and sees for the efficiency of the hedging transactions and reports the results to the Investment Committee on a monthly basis.

10) In order to manage the price risk related to the investments in real estate properties, a monitoring report on the properties is prepared and presented to the Investment Committee of the Pension Assurance Company Doverie AD at least once a year regarding the investments in real estate properties. The report analyzes the current situation, the effectiveness, the market trends and the inherent risks, associated with the investments of the Voluntary Pension Fund Doverie in real estate properties.

11) In case of identified violations of the investment limits and restrictions, outlined in the Internal rules on the procedures for monitoring, measuring and management of the risk related to the investments of the Pension Assurance Company Doverie AD and the funds managed thereof or those in this Statement of Investment Policy or those in the Social Security Code, the Risk Management Department reports the violation to the Managing board, the head of the Internal Control Department, the Internal auditor, the Risk Committee and the Investment Committee and explains the reason for the occurrence thereof. The Risk Management Department prepares, depending on the violations, proposal for remedy of such violation, which is approved by the Chairperson of the Managing board and/or the Executive director supervising the Finance, Accounting and Investments Department of the Pension Assurance Company Doverie AD.

12) The organization of the operations and the levels of responsibility regarding the management of the risk related to the investments of the Voluntary Pension Fund Doverie are regulated by Internal rules on the procedures for monitoring, measuring and management of the risk related to the investments of the Pension Assurance Company Doverie AD and the funds managed thereof and by the Organizational Rules of the Investment Committee to the Pension Assurance Company Doverie AD that are purposed to provide for the daily monitoring, assessment and management of the risk triggering factors having adverse effect on the value of the assets in the portfolio of the Pension Assurance Company Doverie AD.

5. Hedging transactions - purposes of use, types of transactions, risks to be hedged,

amount of the risk exposure. Degree of hedging of the investment risks, associated with fund's investments

1) Hedging transactions - purpose of usage and types of transactions

Pension Assurance Company Doverie AD may enter into hedging transactions under article 179b, paragraph 1 of the Social Insurance Code for and on behalf of the Voluntary Pension Fund Doverie only for the purpose of **reducing the investment risks**, related to fund's assets.

2) Risks, subject to hedging

The risks outlined in Part IV, item 1, 1) and 2) may be mitigated by means of hedging transactions.

3) Size of the risk exposure

The size of the risk exposure subject to hedging is determined by the Risk Management Department, after a detailed analysis of the portfolio, taking into account all the factors associated with the existing market situation.

4) Degree of hedging of the investment risks

The degree of hedging of a specific investment risk is determined on the basis of analysis of the exposure of the Voluntary Pension Fund Doverie to that risk, the existing market situation and the potential quantitative impact of a particular hedging transaction, respectively non-hedged risk exposure.

V. TERMS AND CONDITIONS, INTERVALS AND TERMS FOR REVIEW OF THE INVESTMENT POLICY

1. Intervals and methods for assessment of investment policy's efficiency

The assessment of investment policy's efficiency is done by comparing the realized return and the benchmark defined in chapter II, item 3 on a 6-month basis. In case the return of the Voluntary Pension Fund Doverie portfolio is lower than the indicator defined in chapter II, item 3 for two 6-month periods in a row, the investment consultant, the portfolio managers and/or the financial analysts should present to the Investment Committee a detailed analysis of the reasons for the shortfall and propose measures to be undertaken in order to achieve the investment policy objectives.

2. Procedures and criteria for Investment policy review.

The Investment Committee proceeds to review of the Investment policy as regards the managing principles of the Voluntary Pension Fund Doverie annually or immediately after occurrence of any major changes in the market and other relevant conditions.

3. Procedures and criteria for implementation of changes in the Investment policy

Once the efficiency of the Investment policy is assessed as outlined in item 1 of this section, the investment consultants, the portfolio managers and/or the financial analysts prepare, as appropriated, substantiated proposal to the Investment Committee for amendment thereof which are subject to approval by the Investment Committee and to further adoption the Managing Board of Pension Assurance Company Doverie.

This Statement of Investment Policy has been adopted by decision taken by Minutes No 370 dated 19.08.2019 by the Managing board of Pension Assurance Company Doverie and repeals the Statement of Investment Policy of the Voluntary Pension Fund Doverie, adopted by decision taken by Minutes No 315 dated 21.05.2015 as amended and supplemented by decision taken by Minutes No 349 dated 16.10.2017 of the Managing board of the Pension Assurance Company Doverie.

This Statement of Investment Policy has been amended and supplemented by decision taken by Minutes No 377 dated 22.04.2019 of the Managing board of the Pension Assurance Company Doverie and decision taken Minutes No 394 dated 28.04.2020 of the Managing board of the Pension Assurance Company Doverie.

Annex 1

Specific Requirements Regarding Asset Classes Characteristics

1. Government bonds - debt securities issued or guaranteed by a state.
2. Corporate bonds - debt securities issued and guaranteed by a legal entity.
3. Municipal bonds – debt securities issued and guaranteed by a municipality
4. Common stocks - securities representing the right of corporate equity ownership.
5. Common stocks rights – securities that give stockholders the right to subscribe new shares issued by a public company should there be a resolution to increase the capital of that company/
6. Common stocks warrants – securities that entitle the holder to buy a proportionate quantity of stock at a fixed price up until a specific deadline.
7. Collective investment schemes – the collective investment scheme is an undertaking, organized as an investment firm, common contractual fund or share trust, which invests in securities, money market instruments, and other liquid financial assets, raised through public offering of units or shares.
8. Special investment purpose companies - investment companies securitizing real estate properties or receivables.
9. Deposits – cash funds placed for safekeeping in credit institutions and subject to return to the depositor following predefined terms and conditions.
10. Investment property is an investment property within the meaning of International Accounting Standard (IAS) 40.
11. Alternative investment funds – shares and/or units of alternative investment funds, managed by an entity, authorized in accordance to Directive 2011/61/EU of the European parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 (JO, L 174/1 dated 1 July 2011).

Annex 2

Acceptable financial Instruments

Instrument	Limits	Notes
1. Debt securities, issued or guaranteed by:		
1.1. member - states, the liabilities of which represent a debt of the governments or the central banks thereof	No limits	Up to 20% of the outstanding amount of the bond issue
1.2. the European Central Bank or by the European Investment Bank;	No limits	Up to 20% of the outstanding amount of the bond issue
1.3. another state, indicated in an ordinance of the Commission, the liabilities of which represent a debt of the government or the central banks thereof, admitted to trading on the regulated markets in a member - state or admitted to trading on an official market of a stock exchange, or other organized market in a third state, operating regularly and recognized and open to the public	No limits	a) No limits for securities with an investment credit rating from a single issuer b) Up to 5% of securities without an investment credit rating from a single issuer c) Up to 20% of the outstanding amount of the bond issue
1.4. state, other than those referred to in item 1.3, the liabilities of which represent a debt of the government or the central banks thereof, admitted to trading on regulated markets in a member - state	No limits	a) Up to 5% of the securities of a single issuer b) Up to 20% of the outstanding amount of the bond issue
1.5. international financial organizations with investment grade credit	No limits	a) Up to 5% of the securities of a single issuer b) Up to 20% of the outstanding amount of the bond issue
2. Securities traded on regulated markets		
2.1. Corporate Bonds	No limits	a) Up to 5% of the securities (bonds and stock) of a single issuer b) Up to 20% of the outstanding amount of the bond issue
2.2. Shares, Preferred Shares, Rights and Warrants	No limits	a) Up to 5% for securities (bonds and equity) of a single issuer b) cannot acquire more than 7% of the shares of a single issuer
3. Municipal Bonds	No limits	a) Up to 5% of the securities of a single issuer b) Up to 20% of the outstanding amount of the bond issue

4. Bank deposits	No limits	a) in banks with minimal credit rating; b) Up to 5% in a single bank
5. Infrastructure Bonds	No limits	a) Up to 5% of the securities of a single issuer b) Up to 20% of the outstanding amount of the bond issue
6. Investment Properties	Up to 10%	Up to 5% per property
7. Shares and Rights of SIPV	Up to 10%	a) Up to 5% of the securities (bonds and equity) of a single issuer b) cannot acquire more than 7% of the shares of a single issuer c) Up to 2% in SIVP, which securitize receivables
8. Secured corporate bonds to be listed within 6 months	Up to 2%	Up to 20% of the outstanding amount of the bond issue
9. Collective investment schemes	No limits	a) Up to 5% per CIS b) Up to 10% in CIS managed by one and the same asset management company b) Up to 15% of the shares/units of a single CIS
10. Shares and/or units of Alternative Investment Funds	Up to 2%	a) Managed by an entity, authorized in accordance to Directive 2011/61/EU of the European parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 (JO, L 174/1 dated 1 July 2011) b) Up to 7% of the shares/units of a single Alternative Investment Fund
11. Equity from IPO	Up to 2%	a) To be listed within 12 months b) cannot acquire more than 7% of the shares of a single issuer
12. Bonds from IPO	Up to 3%	a) To be listed within 12 months b) Up to 20% of the outstanding amount of the bond issue
13. Repurchase agreements and reverse repo agreements	Up to 5%	Up to 6 months
14. Assets denominated in currency other than BGN or EUR	Up to 30%	Excluding the assets which are hedged against currency risk
15. Total amount of the investments of the Voluntary Pension Fund Dovere in financial instruments issued by companies of the same group and the parties they are in close relations with	Up to 10%	
16. Covered bonds	Up to 4%	Up to 20% of the outstanding amount of the bond issue

Annex 3

Target Strategic Asset Allocation, Minimum and Maximum Deviation Limits

Voluntary Pension Fund Dovereie			
Instruments	Minimum	Target Asset Allocation	Maximum
Cash and equivalents	1.00%	8.00%	30.00%
Under item 4 of Annex 2	0.00%	0.00%	40.00%
Under item 1.1, item 1.2 и item 1.3 of Annex 2	10.00%	40.00%	75.00%
Under item 1.4. of Annex 2	0.00%	2.00%	10.00%
Under item 1.5 of Annex 2	0.00%	2.00%	10.00%
Under item 2.1 of Annex 2	4.00%	10.00%	40.00%
Under item 8 of Annex 2	0.00%	0.00%	2.00%
Under item 3 of Annex 2	0.00%	0.00%	20.00%
Under item 5 of Annex 2	0.00%	0.00%	15.00%
Under item 2.2 of Annex 2	5.00%	18.00%	40.00%
Under item 7 of Annex 2	0.00%	1.00%	10.00%
Under item 6 of Annex 2	0.00%	4.00%	10.00%
Under item 11 of Annex 2	0.00%	0.00%	2.00%
Under item 12 of Annex 2	0.00%	0.00%	3.00%
Under item 9 of Annex 2	3.00%	14.50%	45.00%
Under item 10 of Annex 2	0.00%	0.50%	2.00%
Under item 13 of Annex 2	0.00%	0.00%	5.00%
Under item 16 of Annex 2	0.00%	0.00%	4.00%