

PEPP Key Information Document

MOCK KID – current requirements

This product provides you with key information about this pan-European Personal pension Product (PEPP). It is not a marketing material.

The information is required by law to help you understand the nature, risks, costs, potential gains and losses of this personal pension product and help you compare it with other PEPPs. **This is not a real PEPP KID - it is a mock designed solely for policy and advocacy purposes.**



The European Federation of Investors and Financial Services Users
Fédération Européenne des Épargnants et Usagers des Services Financiers

[PEPP provider] PEPP - basic

Central Registry number: EIOPA001/2019

[PEPP PROVIDER NAME IN FULL]

[address]

[PEPP Provider] is supervised by the Belgian Financial Services and Markets Authority

Rue du Congrès 12/14, 1000 Brussels
Belgium

The retirement product described in this document is a long-term product with limited redeemability which cannot be terminated at any time.

What is this product?

Investment objectives

This product aims to increase the value of your accumulated capital and provide you with additional income at retirement by investing in a diversified portfolio of equities (shares, units in UCITS and UCITS ETFs) bonds, real estate and other securities, such as cash or money market instruments) issued or listed on regulated trading venues in the European Union. The investment strategy is based both on a direct and indirect exposure to the types of financial assets described above. Your cash contributions (accumulated capital) will be used to buy and hold the abovementioned types of financial assets that will generate positive investment returns.

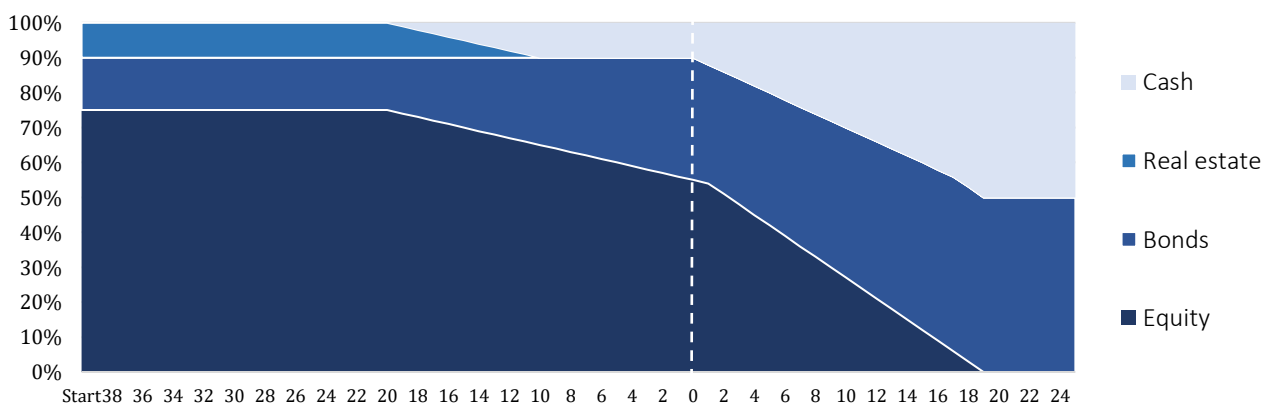
Target investor

This product is a long-term investment product with the aim of providing an additional income at retirement for the PEPP saver under the form of periodical payments. This product is addressed to potential investors intending to hold it at least 20 years (minimum holding period). The recommended holding period is 40 years, after which the investor may withdraw the gains entirely, as a lump sum, or partially, as annuities or drawbacks. This product is recommended for potential investors having a higher risk tolerance and a higher financial capacity to bear losses.

Capital protection

This product uses a strategic reallocation of your capital from riskier to safer assets in order to maximise returns in the earlier stages of the product and ensure stability and growth in the later stages of the product. A target allocation is applied to the assets, which will change over time according to the reallocation strategy and glidepath. At its launch, the fund has a significant stock component, which on the long-term allows for an optimised risk-return profile. Towards the retirement date, and during the decumulation phase, the majority of your capital will be held in safer assets and in cash, to allow for pay-outs without losing value or your uncalled capital. The stock component is invested in a selection of shares issued by Eurozone denominated companies or share-related investments that may come from the Eurozone. The bond component includes long-term bonds, bond-related investments and money market instruments. The real estate component may come from any region, sector or theme. The glidepath of the asset reallocation is as follows:

Life-cycling asset reallocation glidepath



The reallocation glidepath will be determined by the asset manager on a periodical basis, with the aim of keeping to the glidepath shown above.

Warning: this product does not offer any capital protection or inflation indexation.

Retirement benefits

Upon reaching retirement age (specified in the PEPP contract) you will be able to choose whether to withdraw all your accumulated capital as a lump sum or periodically, such as annuities.

Portability	This product is portable in the Eurozone. This means that, if you change residence, you can choose to continue to contribute to the sub-account opened in your current Member State of residence or switch to a new sub-account in another Eurozone Member State free of any charge. There are no consequences if you stop contributing to any sub-account.
Early withdrawal	This product is meant to be held until reaching retirement age. However, if you choose to withdraw or terminate the contract earlier, you might suffer losses on your accumulated capital as the risk-mitigation technique is designed to ensure an optimal risk-reward profile until retirement age.
Switching PEPP providers	You will have the right to terminate the PEPP contract and switch to another PEPP provider (receiving PEPP provider) after 5 years of concluding a PEPP contract with this PEPP provider (transferring PEPP provider) subject to a switching fee of 0.5%. The transferring PEPP provider shall provide you, in physical or electronic format, the PEPP Benefit Statement, within five working days of the date when you make the switching request, which will also be sent to the receiving PEPP provider. As this PEPP does not offer individual portfolio management, there are no assets in kind to be transferred to the new PEPP provider, only the cash value of your accumulated capital, calculated in accordance with the valuation rules set out in the Prospectus, net of the costs and charges set in this KID and in the PEPP contract. The receiving PEPP provider shall not charge you any additional fees for the switching service. The switching process shall take 2 working weeks starting with the day when the transferring PEPP provider receives your valid switching request. If you switch to a receiving PEPP provider, you may lose all capital protection or guarantee offered by the transferring PEPP provider.
Switching the investment option	You will have the right to switch between sub-accounts or to a new investment option provided by this PEPP provider after a minimum of five years after the conclusion of a PEPP contract concerning this basic investment option or, in the case of subsequent switches to investment option, after a minimum of five years after the last switching has taken effect. The switching services between this PEPP provider's sub-accounts, investment options and the investment options' sub-accounts shall be made free of charge.
Environmental, Social, and Governance (ESG) considerations	This investment option invests in securities that are ESG compliant, meaning that the issuers of these securities respect environmental, social, and governance standards concerning their activities. The PEPP provider makes an initial screening (negative list) of non-compliant ESG issuers of securities and selects to invest in only the securities of issuers whose activities are in line with the abovementioned criteria. Then the PEPP provider, through its portfolio manager, makes another selection of the ESG-compliant securities based on their risk profile and yield opportunities. To find out more about what environmental, social, and governance standards are, how the selection process is carried out and what criteria are weighted in, please go to [web address].
Applicable law	The law applicable to this PEPP contract will be that chosen by common agreement between the parties (PEPP provider and you), in accordance with the rules set out in the national law of the domicile of the PEPP provider and in the Regulation (EC) No 593/2008 of the European Parliament and of the Council of 17 June 2008 on the law applicable to contractual obligations (Rome I).
Cancellation period	The PEPP saver has the right to terminate this contract free of charges and without any penalties within two weeks of concluding the PEPP contract. The PEPP saver has the right to terminate the contract within 5 years after concluding the PEPP contract with the PEPP saver or distributor subject only to the applicable exit-fees as described in this KID and in the PEPP contract, in accordance with the Prospectus. The PEPP saver has the right to terminate the contract at any point after concluding the PEPP contract with the PEPP provider or PEPP distributor subject to the early termination fees and penalties, including the applicable exit-fees, as described in this KID and in the PEPP contract, in accordance to the Prospectus.

SUMMARY RISK INDICATOR

Risk of loss in real terms by asset type				
Asset class / product	Risk	Holding period		
		1 year	5 year	+ 20 years
Money market instruments	MAG	Low	Medium	High
	PROB	Very high	Very high	Very High
Eurozone equities	MAG	High	High	High
	PROB	High	High	Low to medium
Bonds	MAG	Medium	Low	Low
	PROB	Medium	Medium	High
Real estate	MAG	High	Medium	Low
	PROB	High	High	Medium

The summary risk indicator shows how likely it is that the product will lose money because of the investments made directly (in securities) or indirectly (in other investment products) or because we would not be able to pay you, and what the magnitude of the loss may be in real terms, meaning after taking into account the effect of inflation. The level of risk is measured by asset class and investment horizon.

*MAG = magnitude; PROB = probability.

As the product has a long-term investment horizon, the risk class of this product varies over time.

The risk profile of this product should decrease over time due to the risk-mitigation technique (life cycling) used. We have classified this product as 6 out of 7 in the first ten years of the accumulation period, which is a high-risk class, after 20 years a 5 out of 7 (medium-high), after 30 years 4 out of 7 (medium). In the decumulation phase, the first 20 years are classified as 3 out of 7 (medium-low) and the last 5 as low risk.

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 out, you will lose all of your capital. You do not bear the risk of incurring additional financial obligations.

Consequently, the risk that an issuer can no longer meet its obligations is higher than in an investment that consists only of bonds with an investment grade rating. If investors are in doubt about the creditworthiness of the issuers of the bonds, the value of those bonds can fall.

Summary risk indicator						
Risk and return level	Years to retirement			Years after retirement		
	>30 years	>20 years	>10 years	>10 years	>20 years	25 years
1						
2						2
3				3	3	
4			4			
5		5				
6	6					
7						

Warning! This product does not have a guarantee, nor inflation protection. A low level of risk does not mean no risk at all. Investments are subject to market fluctuations and financial loss and you may lose all your money.

The tax law applicable in your Member State may have an impact on your actual pay-out.

Performance is not constant over time and is not a reliable indicator of future results.

Performances presented on the right side are calculated after deduction of all fees charged by the Fund, and after taking into account the cumulative effect of inflation over time.

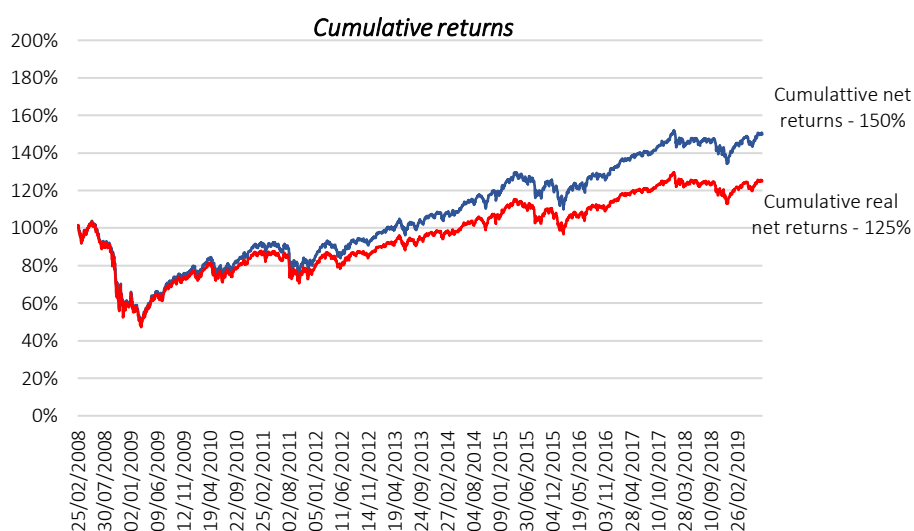
The Fund was launched on [DD/MM/YYYY].

The reference currency is the [currency (symbol)].

The benchmark index is: [benchmark].

PAST PERFORMANCE

Average returns			
Last year	3 years	10 years	Since inception
Average net returns			
1.67%	5.65%	8.00%	3.59%
Average real net returns			
0.10%	3.87%	6.36%	1.95%



Note: Real net returns means returns after deduction of fees and inflation.

PENSION PROJECTIONS

This table shows the money we **expect** you could get back at the target retirement date of the product [year], assuming that you invest 10000 [currency (symbol)]. The two scenarios shown illustrate **the maximum profit and loss we expect** your investment could generate and **are not an exact indicator**. The scenarios presented are an estimate of future performance based the product's past performance and take into account the potential impact of **inflation**.

<i>Investment of 10,000€</i>	Maximum in [target date]
What we expect you to gain	20,000 €
What we expect you to lose	5,000 €

What you get will vary depending on how the market performs and how long you keep the product/investment. The figures shown include all the costs of the product, but do not take into account your personal tax situation, which may also affect how much you get back.

Pension projections are not a reliable indicator of future returns.

What happens if [PEPP Provider] is unable to pay out?

You bear only the risks of loss related to unprotected or not guaranteed investments in capital markets. If the PEPP provider is not able to pay out your earned capital gains, for instance due to fraud or breaches of the law, you are protected by an investor compensation scheme, covering up to 90% of the product's investments, subject to certain conditions. For more info, see https://ec.europa.eu/info/business-economy-euro/banking-and-finance/consumer-finance-and-payments/consumer-financial-services/investor-compensation-schemes_en.

What are the costs?

The charges and fees paid are used to cover the costs of running the Fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

Costs taken last year		Contractual costs	
Entry fees	Exit fees	Entry fees	Exit fees
2% = 200€	1% = 100€	2%	1%
Performance fees	Ongoing costs	Performance fees	Ongoing costs
0%	1% = 100€	2%	1.50%
Distribution costs		Distribution costs	
0.50% = 50€		0.5% - 2%	

Distribution, administrative and transaction costs are included in the ongoing costs

Purchases and sales on the secondary market do not incur any entry or exit fees. However, in addition to the fees shown, other fees may apply such as brokerage fees or stock exchange fees, over which the Management Company has no control.

The **ongoing charges** are based on the figures for the prior year ended [DD/MM/YYYY]. This percentage may vary from year to year. It excludes: Performance fees, Broking fees.

Reduction-in-Yield (RIY)	
Average gross return	3% p.a.
Costs	1.4% p.a.
RIY	-53%

For more information about the charges of this Fund, please refer to the "Costs and Fees" section of the Fund's prospectus, which is available at [web address].

What are the specific requirements for the sub-account corresponding to Belgium?

Requirements for the pay-in phase

According to Belgian legislation, the statutory retirement age is 65 years for women and 67 years for men, and a complete career (vesting period) is of 45 years. Pension contributions are not taxed during the pay-in (accumulation phase). There is no minimum amount or continuity requirement of contributions to benefit of pay-out under this product. Contributions into this PEPP will be eligible for a tax exemption and deductible from the income tax. If your annual contributions are below 960€, you will benefit of a tax relief rate of 30%. If your annual contributions are equal or higher to 960€ and lower than 1,230€, you will benefit of a tax relief of 25%. However, in order to benefit of reduced taxation on your pay-outs (see below) you must hold this PEPP at least 10 years and make at least 5 contributions.

Requirements for the pay-out phase

This basic PEPP fall under the *pension savings fund* category of the Belgian Pillar III. You have the freedom to choose how the pay-outs of your accumulated contributions will be performed: lump-sum pay-out, limited drawbacks or periodical payments, or a mix of the latter. Your pension benefits are subject to a tax rate of 8%. You can start withdrawing from your basic PEPP at the age of 60. If you withdraw earlier than the age of 60, your accumulated capital will be taxed under the personal income tax system. If you choose to start withdrawing between the ages of 60 and 64, you will be subject to a 33% tax on accumulated capital. If you choose to withdraw at or after the age of 65, your accumulated capital will be subject to a tax rate of 8%. This product does not constitute pension reserves, thus the tax on reserves is not applicable.

How can I complain?

Complaints about the PEPP, the PEPP distributor or provider

You can submit any complaints you may have by e-mail to complaints@website.be or, by telephone on [number] or [number]. The full complaints procedure is available at [web address].

Alternative Dispute Resolution

In accordance with the relevant provisions of the [PEPP contract/ General Terms and Conditions], in case that you do not receive a response to your complaint within the specified time-frame or that the response is not satisfactory, you may address your to the [ADR body] against the PEPP provider or distributor. You can contact the [ADR body] by e-mail (adres@website.be) or by telephone (number) or via physical mail at [address].

Online Dispute Resolution

You may also submit your complaint to the online dispute resolution bodies (ODR) registered in Belgium or in your Member State of domicile. The find out the ODR bodies registered in Belgium, visit <https://ec.europa.eu/consumers/odr/main/?event=main.home.selfTest>.

Redress measures

In accordance with the Directive (EU) 2019/XXXX on representative actions for the protection of the collective interests of consumers, you may file a complaint to the authorised entities in your Member State of domicile in order to obtain judicial injunctions and redress (compensation) measures. For more info, visit [web address]. You may also file an individual action yourself in accordance with the provisions of national law in your Member State of domicile.

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