

ATLAS Global Infrastructure UCITS ICAV (the "ICAV")

This Country Supplement dated 7 May 2024 forms part of and should be read in conjunction with the Prospectus dated 24 April 2024 (the "Prospectus") and the Supplement to the Prospectus dated 24 April 2024.

ADDITIONAL INFORMATION FOR INVESTORS IN THE FEDERAL REPUBLIC OF GERMANY

The offering of the Shares of ATLAS Global Infrastructure Fund (the "**Fund**") has been notified to the German Financial Services Supervisory Authority in accordance with section 310 of the German Investment Code (*Kapitalanlagegesetzbuch-KAGB*).

I. Information Agent in Germany

The role Information agent in Germany in accordance with section 309 para. 2 of the German Investment Code ("**German Information Agent**") has been undertaken by

Marcard Stein & Co AG
Ballindamm 36,
20095 Hamburg, Germany

The Prospectus, the Supplement to the Prospectus in relation to the Fund, the key investor information documents, copies of the Instrument of Incorporation of the ICAV as well as the annual and semi-annual reports are available in paper form free of charge at the German Information Agent.

The following material contracts and documents are available for inspection free of charge at the German Information Agent:

- the Administration Agreement dated 22 September 2017 between the ICAV, the Manager and the Administrator;
- the Depositary Agreement dated 22 September 2017 between the ICAV, the Manager and the Depositary;
- the Investment Management Agreement dated 22 September 2017 between the ICAV, the Manager and the Investment Manager;
- The Central Bank UCITS Regulations and guidelines issued by the Central Bank from time to time affecting the ICAV or any Fund;

The latest subscription, conversion and redemption prices as well as possible notices to investors are available free of charge upon request at the office of the German Information Agent.

II. Redemption Requests from and Payments to shareholders in the Federal Republic of Germany

Investors in Germany can submit their redemption and conversion requests relating to the Shares of the Company to the respective entity in Germany maintaining their custody accounts (*depotführende Stelle*) which will in turn forward the requests for processing to the Administrator of the Company or will request the redemption on its own name for the account of the investor.

Distributions of the Company, the payments of redemption proceeds and other payments to the investors in Germany will also be made through the respective entity in Germany maintaining the client's custody account (*depotführende Stelle*) which will credit the payments to the investor's account.

III. Publications

The subscription and redemption prices as well as notices to Shareholders will be published on the website www.atlasinfrastructure.com.

The investors in Germany will be additionally informed by means of a durable medium in accordance with section 167 of the German Investment Code about the following changes:

- the suspension of the redemption of the Shares;
- the termination of the management or liquidation of the ICAV or a Fund;
- changes to the Instrument of Incorporation of the ICAV that are incompatible with the existing investment policies, that affect material investor rights or that affect the fees and reimbursement of expenses that can be paid out of the assets of the ICAV or the Fund, including the reasons for such changes, the investor rights and where and how investors may obtain additional information;
- the merger of funds in the form of the information on the merger that is required to be prepared according to article 43 of the Directive 2009/65/EC; and
- the conversion of a fund into a feeder fund or changes to a master fund in the form of the information that are required to be prepared according to article 64 of the Directive 2009/65/EC

IV. Taxation in Germany

The following section provides for a very brief overview of certain German income tax consequences of purchasing, owning and disposing of Shares in the Fund at the level of investors that are tax resident in Germany ("German Tax Residents"). It does by no means purport to be a comprehensive description of all German tax considerations relating to an investment of German Tax Residents in the Fund. In particular, it does not consider any specific facts or circumstances applicable to any particular investor or group of investors. Hence, the following does not constitute, and cannot be construed as tax advice to any particular investor. This section is based on the laws and regulations in force and applied by German courts and fiscal authorities at the date of the Memorandum. Such laws and regulations may change after the date of the Memorandum, possibly with retroactive effect.

In 2017, the German Investment Tax Act has been reformed with general application as from 1 January 2018 ("**Investment Tax Act**"). The Investment Tax Act is, subject to certain exceptions, applicable to investment funds (*Investmentvermögen*) within the meaning of the German Investment Law Act (*Kapitalanlagegesetzbuch*) that qualify as corporations (*Körperschaften*) or asset pools (*Vermögensmassen*) from a German tax perspective. The applicable rules of the Investment Tax Act depend on whether the respective fund is considered an investment fund within the meaning of chapter 2 of the Investment Tax Act ("**Chapter 2-Fund**") or within the meaning of chapter 3 of the Investment Tax Act (so-called special investment funds; "**Chapter 3-Fund**").

The Fund conceptually qualifies as a Chapter 2-Fund. Hence, the following items of income resulting from an investment in the Shares in the Fund are generally taxable at the level of German Tax Residents (so-called "Investment Income"):

- current distributions, including distributions of capital (*Substanzausschüttungen*), by the Fund;

- advance lump-sum amounts (*Vorabpauschale*); the advance lump-sum amounts correspond to the amount by which the distributions of the Fund in a calendar year fall short of the base income (*Basisertrag*) for such a calendar year. The basic income is determined by multiplying the redemption price for the investment fund unit at the beginning of a calendar year with 70% of the base interest rate derived from the long-term return obtainable from government bonds as determined by German Federal Bank (*Deutsche Bundesbank*) and published by the Federal Ministry for Finance (*Bundesfinanzministerium*). The base income may not exceed the surplus which results from the difference between the first and the last redemption price of the respective calendar year plus the distributions during such calendar year. The advance lump-sum amount is deemed to be received on the first working day of the following calendar year. For the year during which Shares are acquired the advance lump-sum amount is reduced by 1/12 for each full month preceding the month during which Shares were acquired; and
- capital gains from a disposal, including a redemption, of the Shares in the Fund.

In general, such Investment Income is fully taxable at the level of German Tax Residents. Most notably, the participation exemption provision under the German Corporate Income Tax Act does not apply. The applicable tax rates depend on the personal tax status of the particular investor. The tax due may be collected by way of German withholding tax.

However, the Investment Income may be partially tax-exempt at investor level pursuant to the so-called partial exemption regimes (*Teilfreistellungsregime*) in case the Fund is considered a stock fund (*Aktienfonds*), mixed fund (*Mischfonds*) or real estate fund (*Immobilienfonds*). In the latter case, Investment Income is generally tax-exempt at a percentage of 60% for corporate income tax and personal income tax purposes and 30% for trade tax purposes. Provided that the fund qualifies as a so-called foreign real estate fund (*Auslands-Immobilienfonds*), the percentage of the exemption amounts to 80% and 40%, respectively. For stock funds and mixed funds, the applicable tax-exemption rates also depend on the personal tax status of the particular German Tax Resident.

But, neither the Prospectus nor the Supplement explicitly include specific restrictions that ICAV will continuously invest a certain percentage of their net assets in equity assets as defined in sec. 2 para 8 German Investment Tax Act (2018) or in real estate assets as defined in sec. 2 para. 9 German Investment Tax Act (2018). However, the management of the Fund intends to hold (directly or indirectly through other funds shares in equity as defined in sec. 2 (8) of the German Investment Tax Act of more than 50% of the Fund's assets. Consequently, German investors should be entitled to partial exemption as a Aktien- or at least a Mischfond but only by evidence provided by ICAV. In case the thresholds of percentages applicable to Aktien- and/or Mischfonds are not met for a period of at max. 20 days for tax purposes the Shares in ICAV are deemed to be sold and acquired again at the fiscal year end of the respective German Investor.

According to the current legal situation, the German CFC rules (*Hinzurechnungsbesteuerung*) do not apply to the Fund based on its classification as an investment fund (*Investmentfonds*). Due to the implementation of ATAD I & II into German law, it is expected that the German CFC rules will be amended in 2020. Therefore, it cannot be ruled out that as a consequence of this implementation, the German CFC might in the future become applicable with regard to the Fund at the level of German Tax Residents.

Prospective investors are strongly advised to seek professional advice concerning the tax consequences of acquiring, holding and disposing Shares in the ICAV prior to making the investment.