



ATLAS GLOBAL INFRASTRUCTURE UCITS ICAV

AUSTRIAN COUNTRY SUPPLEMENT

ADDITIONAL INFORMATION FOR INVESTORS IN AUSTRIA

This supplement contains information specific to (potential) investors in Austria regarding ATLAS Global Infrastructure UCITS ICAV (the "*Company*"). It forms part of and must be read in conjunction with the prospectus of the Company dated 24 April 2024, as amended and supplemented from time to time (the "*Prospectus*").

All capitalised terms used herein shall have the same meaning as set forth in the Prospectus, unless otherwise indicated.

REGISTRATION AND SUPERVISION

The Company is an open-ended investment company with variable capital constituted as an umbrella fund with segregated liability between its funds under the laws of Ireland authorised and regulated by the Central Bank of Ireland pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011, as amended, supplemented or consolidated from time to time.

All mention of the terms "Shares" or "Fund" in this country supplement refers solely to Shares in the following sub-funds of the Company (the "**Sub-Funds**") which are registered for marketing in Austria in accordance with the Austrian Investment Funds Act of 2011 (*Investmentfondsgesetz 2011, "InvFG"*).

Atlas Global Infrastructure Fund

DISTRIBUTION IN AUSTRIA

The Company's intention to market the Sub-Funds listed above in Austria has been notified to the Austrian Financial Market Authority in accordance with section 140 (1) of the InvFG. The Company satisfies the conditions applicable to undertakings for collective investment in transferable securities (UCITS) stipulated by Directive 2009/65/EC (as amended, supplemented or consolidated from time to time, the "**UCITS-Directive**").

FACILITIES AND TASKS PERFORMED IN AUSTRIA

In accordance with article 92 of the UCITS-Directive, the Company makes available the following facilities to perform the following tasks in Austria, including electronically:

Tasks (cf. Art 92 (1) UCITS-Directive)	Facility/ies performing such tasks
a) Process subscription, repurchase and redemption orders and make other payments to unit-holders relating to the units of the Company, in accordance with the conditions set out in the documents required pursuant to Chapter IX of the UCITS-Directive;	Erste Bank der oesterreichischen Sparkassen AG Am Belvedere 1, 1100 Vienna, Austria E-Mail: foreignfunds0696@erstegroup.com ("Erste Bank" or "Austrian Facility")
b) provide investors with information on how orders referred to in point a) can be made and how repurchase and redemption proceeds are paid;	Erste Bank see contact details above.
c) facilitate the handling of information and access to procedures and arrangements referred to in Article 15 of the UCITS-Directive, relating to the investors' exercise of their rights arising from their investment in the Company in Austria;	Erste Bank see contact details above.
d) make the information and documents required pursuant to Chapter IX of the UCITS-Directive available to investors under the conditions laid down in Article 94 of the UCITS-Directive, for the purposes of inspection and obtaining copies thereof;	Erste Bank see contact details above.
e) provide investors with information relevant to the tasks that the facilities perform in a durable medium; and	Erste Bank see contact details above.
f) act as a contact point for communicating with the competent authorities.	Erste Bank see contact details above.

For electronic access to the above tasks, please refer to www.atlasinfrastructure.com

DOCUMENTS AND INFORMATION AVAILABLE FOR INSPECTION

The following documents are available for inspection free of charge during normal business hours on weekdays (Saturdays and public holidays excepted) at the registered office of the Company and at the Austrian Facility:

- the constitutional documents of the Company;
- the Prospectus and Supplements (as amended and supplemented);
- the Key Investor Information Documents (KIIDs);
- the annual and semi-annual reports relating to the Company when available; and
- subscription and redemption prices.

Copies of the constitutional documents of the Company (each as amended from time to time in

accordance with the requirements of the Central Bank) and the latest financial reports of the Company, may be obtained, free of charge, upon request at the registered office of the Company and the Austrian Facility. All documents are available in the English language; the Key Investor Information Documents (KIIDs) are also available in the German language.

PUBLICATION

In accordance with sec. 136 *et seqq.* of the InvFG 2011 (to the extent applicable), the Company has to publish certain documents including the annual report for the last financial year, the semi-annual report, the Key Investor Information Documents (KIIDs), the Prospectus, in the event of liquidation, the liquidation report for the respective accounting year and as at the effective date of the liquidation, as well as the subscription and redemption prices of the Shares and other documents and information, which must be published in the Company's home Member State, Ireland and in Austria in accordance with sec. 136 (4) InvFG 2011.

TAXATION

The tax representative in Austria (the "**Austrian Tax Representative**") in accordance with section 186 (2) (2) (b) of the InvFG 2011 is:

KPMG Alpen-Treuhand GmbH

Wirtschaftsprüfungs- und
Steuerberatungsgesellschaft
Porzellangasse 51
1090 Wien

Austrian investors are hereby informed that the Austrian tax status of shares in any of the Company's Funds (reporting or non-reporting Fund) can be found in the list maintained by Österreichische Kontrollbank ("**OeKB**") at www.profitweb.at.

The following is a summary of taxation in Austria of Austrian investors in the Company.

The description below is based solely upon Austrian tax law in force as of May 10, 2024. Austrian tax laws and their interpretation by the tax authorities may be subject to change, possibly with retroactive effect. It cannot be ruled out that the Austrian tax authorities adopt a view different from that outlined below.

The summary is for general information only and does not purport to constitute exhaustive tax or legal advice. It is specifically noted it will not be possible to describe all possible tax questions and consequences, which may arise when investing in the Company and therefore, this summary is not exhaustive. Under all circumstances potential investors **are advised to consult their own tax advisor**, e.g., attorney or auditor, on the consequences of investment into the Company.

Where in this summary English terms and expressions are used to refer to Austrian concepts, the meaning to be attributed to such terms and expressions shall be the meaning to be attributed to

the equivalent Austrian concepts under Austrian tax law.

The following information applies to investment fund accounting years commencing after 31 December 2012 and assumes that the non-Austrian investment fund is not classified as a non-Austrian real estate fund as defined in sec. 42 (1) of the Austrian Real Estate Investment Fund Act ("*ImmInvFG*") or does not generate income from real estate management or fair value revaluation gains as defined in sec. 14 (2) (1) and (2) *ImmInvFG*.

The following two chapters on "reporting funds" assume that the non-Austrian investment fund has an Austrian tax representative as defined in sec. 186 (2) (2) (b) *InvFG* 2011, who is responsible to submit annual reports to the OeKB as the reporting agent. The tax consequence of flat-rate taxation in the event this reporting is not made is described in the last chapter ("non-reporting funds").

Reporting Funds: Tax treatment of shares held by individuals in a non-Austrian investment fund

1. Distributions of income from savings and investments (income as defined in sec. 27 of the Austrian Income Tax Act (*Einkommensteuergesetz*, "EStG"), *Einkünfte aus Kapitalvermögen*), i.e. income from the provision of capital (sec. 27 (2) EStG, e.g. dividends, interest), income from realised capital gains (sec. 27 (3) EStG), income from derivatives (sec. 27 (4) EStG) and income from cryptocurrencies (sec. 27 (4a) EStG) less the related expenses incurred by the investment fund are classified as the investor's taxable income. If proportionate interest as defined in sec. 27 (2) (2) EStG or current income from cryptocurrencies within the meaning of sec. 27b (2) EStG have already been accounted for in the investment fund's accounts, these are also classified as income from the provision of capital in the meaning of sec. 27 (2) EStG and sec. 27b (2) EStG for tax purposes. Distributions by investment funds from income other than from savings and investments as defined in the EStG less the related expenses are classified as the investor's taxable income pursuant to sec. 186 (5) *InvFG* 2011. In case a distribution is paid, first, the income of the non-Austrian investment fund generated in the current and earlier years falling within the scope of sec. 27 EStG (income from savings and investments), then the income generated in the current and earlier years constituting other income as defined in the EStG and, finally, amounts which do not constitute income according to the EStG are classified as distributed for tax purposes. Losses may be set off against the positive income derived from the capital investments of the non-Austrian investment fund net of expenses. If it is not possible for a negative income from savings and investments (less related expenses) to be set off against profits in one and the same year, it may be set off against the income from savings and investments earned by the non-Austrian investment fund in following years, primarily against income derived from realised capital gains (sec. 27 (3) EStG), income from derivatives (sec. 27 (4) EStG) as well as income from realised capital gains in cryptocurrencies (sec. 27b (3) EStG). Losses carried forward which were not utilised in the accounting years of an investment fund commencing before the 2013 calendar year may be set off in later

accounting years against the income derived by the investment fund from realised capital gains (sec. 27 (3) EStG) or from derivatives (sec. 27 (4) EStG). In this case, however, only 25 percent of the losses carried forward may be utilised for shares which are not held as business assets (sec. 198 (2) (1) InvFG 2011). With respect to the accounting years of the investment fund commencing in or after the 2013 calendar year, the breakdown of the composition of the deemed distributed income (sec. 186 (2) (2) InvFG 2011) must include the total amount of the unused loss carry-forwards.

2. Distributions are taxed upon being paid to the investor. If the income from savings and investments (with the exception of the distribution of dividends on Austrian shares) is distributed to the investor via a paying agent (*auszahlende Stelle*) in Austria, this paying agent must retain Austrian withholding tax at a rate of 27.5 percent. The 27.5 percent Austrian withholding tax is deemed to fully discharge any further income tax liability with respect to this income from savings and investments (final taxation – *Endbesteuerung*), which means that no further income tax is due and the income does not have to be included in the investor's annual income tax return (*Einkommensteuererklärung*) provided that the shares are held by a resident individual as business assets (except for income from realised capital gains, derivatives and cryptocurrencies) or as private assets. Distributions of income from savings and investments for which no Austrian withholding tax is withheld (e.g. in the absence of an Austrian paying agent) must be declared by investors in their annual income tax return and are in general subject to a special flat income tax rate of 27.5 percent unless a paying agent in Liechtenstein has retained withholding tax in accordance with the Treaty between the Republic of Austria and the Principality of Liechtenstein on Cooperation in the Area of Taxation, such that this withholding tax discharges the investor from his income tax liability in Austria. Costs relating to shares held in the non-Austrian investment fund may not be deducted. The individual investor may opt to include the income in his annual income tax return ("application for assessment", "*Regelbesteuerungsoption*"). In this case, the income is taxed at the regular income tax rate (progressive tax rate up to 55 percent) applicable to the investor's total income and any Austrian withholding tax on the income will be credited against the investor's personal income tax liability and will, if exceeding, be refunded.
3. The investor may request a refund of non-Austrian (withholding) taxes payable on the income distributed by a non-Austrian investment fund or have it credited against his Austrian tax liability in accordance with the terms of the applicable double taxation treaty. If the distributions of the non-Austrian investment fund comprise dividends of non-Austrian companies, according to the Foreign Withholding Tax Ordinance of the Austrian Federal Minister of Finance (*Auslands-KESSt-Verordnung 2012*), the foreign withholding tax payable on the distribution in question may be deducted from the Austrian withholding tax to be withheld by the paying agent in Austria up to a maximum of 15 percent of the gross amount of the dividend concerned.
4. If there is no actual distribution or if not the entire income of the non-Austrian investment fund is distributed, all the undistributed income of the non-Austrian investment fund is deemed to have been distributed to the investors in accordance with the rights attached to their shares (so-called deemed distributed income, "*ausschüttungsgleiche Erträge*" as follows:

- if the investment fund distributes an amount equivalent to the Austrian withholding tax to be levied in Austria pursuant to sec. 58 (2) InvFG 2011 within seven months after the end of the business year, at the time of such distribution;
- otherwise at the time the OeKB published the information relevant for the income tax treatment due to a timely notification by the investment fund's tax representative;
- in all other cases (i.e. in case of a non-reporting funds; in this respect, see below) on 31 December of the respective calendar year.

With respect to income from savings and investments, all income from the provision of capital as defined in sec. 27 (2) EStG and current income from cryptocurrencies within the meaning of sec. 27b (2) EStG, as well as 60 percent of the positive balance from realised capital gains (sec. 27 (3) EStG), income from derivatives (sec. 27 (4) EStG) and income from realised capital gains in cryptocurrencies (sec. 27b (3) EStG) less the related expenses are deemed to have been distributed to the investors in accordance with the rights attached to their shares. In case the individual investor is subject to an accounting obligation for tax purposes, the undistributed income of the non-Austrian investment fund has to be taken into account as of the investor's balance sheet date in accordance with the principles of accrual accounting (see below with regard to corporate investors). With respect to shares in a non-Austrian investment fund held as business assets, the entire positive balance from realised capital gains (sec. 27 (3) EStG) and income from derivatives (sec. 27 (4) EStG) as well as income from realised capital gains in cryptocurrencies (sec. 27b (3) EStG) less the related expenses incurred by the investment fund are deemed to have been distributed. The deemed distributed income is subject to Austrian withholding tax at a rate of 27.5 percent or the special income tax rate of 27.5 percent. The individual investor may opt to include the deemed distributed income in his annual income tax return. In this case, the income is taxed at the regular income tax rate (progressive tax rate up to 55 percent) applicable to the investor's total income and any Austrian withholding tax on the income will be credited against the investor's personal income tax liability and, if exceeding, be refunded. In case the deemed distributed income will, in fact, be distributed at a later time, such actual distributions are not taxable.

5. The composition of actual distributions and deemed distributions as well as the information relevant for the calculation of Austrian withholding tax on distributions and deemed distributions and adjustments of acquisition costs must be reported by the investment fund's tax representative as defined in sec. 186 (2) (2) (b) InvFG 2011 to the OeKB ("*reporting funds*"). In this case, the Austrian withholding tax is levied on the basis of this report.
6. Capital gains from the sale of shares in a non-Austrian investment fund acquired after 31 December 2010 constitute taxable income. For tax purposes, a sale also includes the redemption of shares in a non-Austrian investment fund and, where applicable, the withdrawal or any other form of removal of such shares from the investor's account unless the exceptions provided for in sec. 27 (6) (2) EStG apply. Furthermore, in general, any other

circumstances which lead to a restriction of Austria's taxation right with respect to the shares in a non-Austrian investment fund result in capital gains taxation (exit taxation). In case of a restriction of Austria's taxation right vis-à-vis an EU Member State or a state of the European Economic Area, the taxpayer may apply for a payment of the triggered income tax in instalments in accordance with sec. 27 (6) (1) (d) EStG in conjunction with sec. 6 (6) (c) - (d) EStG or for a deferral of taxation until the actual disposal of the shares pursuant to the narrow requirements of sec. 27 (6) (1) (a) EStG. Deemed distributed income increases the acquisition costs of the shares in a non-Austrian investment fund, i.e. the value for tax accounting purposes (sec. 27a (3) (2) EStG). Non-taxable actual distributions of deemed distributed income (e.g. income which is initially taxed as deemed distributed income from income falling within the scope of sec. 27 EStG but which is actually distributed at a later date) as well as distributions which do not constitute taxable income according to the EStG reduce the acquisition costs of the shares in a non-Austrian investment fund, i.e. the value for tax accounting purposes (sec. 27a (3) (2) EStG). Capital gains from the sale of shares in a non-Austrian investment fund realised by individual investors are subject to Austrian withholding tax at a rate of 27.5 percent or the special tax rate of 27.5 percent. In case the 27.5 percent tax rate applies, capital gains are not taken into consideration (neither as part of taxable revenues nor as part of taxable income) when calculating the individual investor's income tax burden. The investor may opt for taxation at the progressive income tax rate (progressive tax rate up to 55 percent). In this case, losses from the sale of a share in a non-Austrian investment fund may only be set off against other income which is subject to a special tax rate in the meaning of sec. 27a (1) EStG (excluding, inter alia, interest income from saving accounts and other non-securitized debt claims against credit institutions (except for manufactured payments and lending fees) and payments made by foundations in the meaning of sec. 27 (5) (7) EStG).

7. At present, Austria does not levy inheritance or gift tax. Therefore, no inheritance or gift tax is levied on a share in a non-Austrian investment fund in Austria. However, in the case of a gift, a special notification obligation exists for gifts of money, receivables, shares in corporations, participations in partnerships, (partial) businesses, movable tangible assets and intangibles if the donor and/or the donee have a domicile, their habitual abode, their legal seat or their place of management in Austria. As a consequence, in the case of a gift, notification requirements may need to be observed.

Reporting Funds: Tax treatment of shares in a non-Austrian investment fund held by a corporation as defined in sec. 7 (3) of the Austrian Corporate Income Tax Act

1. If the investor is a corporation as defined in sec. 7 (3) of the Austrian Corporate Income Tax Act (*Körperschaftsteuergesetz*, "KStG"), the distributions (of income as defined in the EStG) of a non-Austrian investment fund are subject to corporate income tax at a rate of 23 percent. In the case of a nexus relevant for Austrian withholding tax purposes, basically income that is paid by an Austrian custodian agent or, without an Austrian custodian agent, by an Austrian paying agent, capital gains or other capital income will be subject to Austrian withholding tax at a general rate of 27.5 percent. According to sec. 93 (1a) EStG, the Austrian withholding tax may be levied at a rate of 23 percent (instead of 27.5 percent). However, corporations

resident in Austria are obliged to include such income in their corporate income tax return (*Körperschaftsteuererklärung*). In the course of such tax assessment, Austrian withholding tax levied on the income from savings and investments will be credited against the corporate income tax liability of the corporate investor and will, if exceeding, be refunded. A corporation deriving business income from the shares in the non-Austrian investment fund may avoid the application of Austrian withholding tax by submitting a declaration of exemption (*Befreiungserklärung*) pursuant to sec. 94 (5) EStG to the paying agent and the tax authority. The corporate investor may request a refund of non-Austrian (withholding) taxes payable on the income distributed by a non-Austrian investment fund or have it deducted from its corporate income tax liability in accordance with the applicable double taxation treaty (or from the respective withholding tax pursuant to the Foreign Withholding Tax Ordinance of the Austrian Federal Minister of Finance). In case the dividends earned by a non-Austrian investment fund are (deemed) distributed to a corporation, the distribution may be exempt from corporate income tax pursuant to the requirements set forth in sec. 10 KStG. Foreign withholding taxes on such tax-exempt dividends cannot be credited.

2. Income not distributed by the non-Austrian investment fund is recognised as of the corporate investor's balance sheet date in accordance with the principles of accrual accounting and is subject to corporate income tax. In this context, it is sufficient for the non-distributed income of the non-Austrian investment fund recognised at the end of the non-Austrian investment fund's accounting year, to be reported as business profit. If there is no actual distribution or if not the entire income of the non-Austrian investment fund is distributed, all the undistributed income of the non-Austrian investment fund is deemed to have been distributed to the investors in accordance with the rights attached to their shares (so-called deemed distributed income, "*ausschüttungsgleiche Erträge*", see with respect to such deemed distribution already above under 4.). In case the deemed distributed income is, in fact, distributed at a later time, such actual distributions are not taxable. Any levied Austrian withholding tax may be netted with the corporate income tax liability and will, if exceeding, be refunded.
3. The share in a non-Austrian investment fund constitutes a separate asset which may be subject to impairment for tax purposes if its value drops below its value for tax accounting purposes. Capital gains from the sale of shares in a non-Austrian investment fund constitute, in general, taxable income for corporate investors. For tax purposes, a sale also includes the redemption of shares in a non-Austrian investment fund. Furthermore, in general, any other circumstances which lead to a restriction of Austria's taxation right with respect to the shares in a non-Austrian investment fund result in capital gains taxation (exit taxation) (see above under 6.). In case of a restriction of Austria's taxation right vis-à-vis an EU Member State or a state of the European Economic Area, the corporate investor may apply for a payment of the triggered income tax in instalments in accordance with sec. 6 (6) EStG. Deemed distributed income increases the acquisition costs of the shares in a non-Austrian investment fund, i.e. the value for tax accounting purposes (sec. 27a (3) (2) EStG). Non-taxable actual distributions of deemed distributed income (e.g. income which is initially taxed as deemed distributed income from income falling within the scope of sec. 27 EStG but is actually distributed at a later date) as well as distributions which do not constitute taxable income according to the EStG reduce the acquisition costs of the shares in a non-Austrian

investment fund, i.e. the value for tax accounting purposes (sec. 27a (3) (2) EStG). Losses from the sale of shares may be set off.

Non-reporting Funds: Tax treatment of shares held in a non-Austrian investment fund

1. If a non-Austrian investment fund does not satisfy the reporting requirements specified in sec. 186 (2) (2) InvFG 2011 (“*non-reporting fund*”), the distributions of the investment fund are subject to tax at their full amount. Deemed distributed income is subject to a flat tax rate of 90 percent applied to the difference between the first and last redemption price calculated in the calendar year; in any case, the respective income amounts to at least 10 percent of the redemption price calculated at the end of the calendar year. Such income is deemed accrued on 31 December of each calendar year.
2. If the flat-rate taxation described above is applied, the investor holding the shares in a non-Austrian investment fund may submit documents proving the amount of the deemed distributed income or the fact that the actual distribution is tax-free in accordance with sec. 186 (2) (3) InvFG 2011. In case Austrian withholding tax has been levied, this proof must be submitted to the party required to withhold the tax. If the gains have not been realised, this party must refund or back-charge the Austrian withholding tax and correct the acquisition costs, i.e. the value for tax accounting purposes, in accordance with sec. 186 (3) InvFG 2011. If a confirmation (that losses have been set off) has been issued in accordance with sec. 96 (4) (2) EStG, the Austrian withholding tax may only be refunded and the acquisition costs correspondingly corrected if the investor holding the shares in the non-Austrian investment fund instructs the party required to withhold the tax to submit a corrected confirmation to the competent tax authority.

PROCEDURE IN THE EVENT OF TERMINATION

In the event that the Company or a Fund of the Company ceases to market shares in Austria, the investors will be notified hereof. The investors will be informed that the information and documentation will be available to the investors. However, it will be stressed that the KIID may (after expiry of any applicable mandatory continuation period) no longer be available in the German language. Furthermore, the procedure for the payment of dividend and redemption or sale proceeds will be for the Austrian investors, unless the general procedure of the Company or the Austrian legislative environment is subject to change.

DISTRIBUTION

Shares of the sub-funds will be distributed through licensed banks and licensed investment firms.

Further information regarding the Company, including the Company’s prospectus, a Fund’s supplement and, latest annual report and any subsequent half-yearly report (when available) can also be obtained free of charge in English from the Administrator, and on the website of the Manager, Waystone Management Company (IE) Limited.

This Austrian country supplement is dated 07 June 2024.