

MAY 2024



InFocus

Macro comment

A photograph showing a variety of colorful powders, such as pigments or dyes, arranged in small, light-colored bowls. The powders are piled into small mounds and come in many different colors including red, blue, yellow, green, purple, brown, and white. The background is slightly blurred, focusing attention on the individual bowls in the foreground.

What Modi's
re-election means
for India's economy



Scan here to stay up to date with EFG's insights.

WHAT MODI'S RE-ELECTION MEANS FOR INDIA'S ECONOMY

Narendra Modi's Bharatiya Janata Party (BJP) has a significant lead in the opinion polls for India's general election. A third term in power is likely to be confirmed on 4 June and so it is important to assess the economic implications of another five years of a Modi premiership. In this edition of *InFocus*, Economist Sam Jochim delves further into these topics.

Executive summary

One of Modi's key ambitions for his third five-year term as Prime Minister is to grow the manufacturing sector as a share of gross value added (GVA). His 'Make in India' initiative forms a key part of the strategy to achieve this, aiming to attract foreign direct investment into 14 key sectors. However, the policy's success has been debatable. While it is likely that there is a fresh push in Modi's prospective third term, headwinds remain and there are clear areas for policy improvement such as reducing import tariffs.

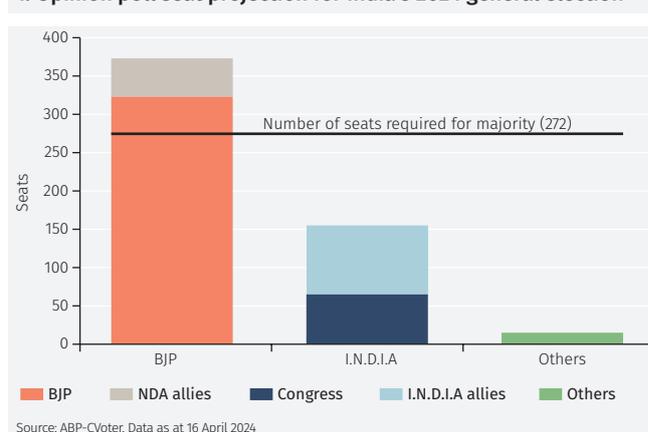
Infrastructure development will form another key area of focus for Modi. In his first ten years as Prime Minister, he focussed on building roads and electrifying railways. These infrastructure targets were ambitious and often they were not achieved, but in attempting to reach them, there was often a significant acceleration in progress. In his third term it is likely that the focus shifts to producing more electric vehicles and developing infrastructure which will help India in its efforts to achieve net-zero by 2070.

Despite his popularity among Indian voters, Modi faces challenges in his prospective third term. Unemployment is the most prominent concern among Indian voters. Youth unemployment is high by historical standards and female labour force participation is low. Reforms to India's outdated labour laws could help tackle these issues.

Election appears a formality

Voting in India's general election began on 19 April and is split into seven phases, lasting 44 days and ending on 1 June. The election is expected to be the largest in the world, with 968 million people eligible to vote, and there is little doubt about the outcome. The National Democratic Alliance (NDA), led by Modi's BJP, is projected to win 373 seats – well above the 272 needed to secure a majority in the Lok Sabha (lower house of Parliament). The opposition coalition, the Indian National Developmental Inclusive Alliance (I.N.D.I.A), led by Mallikarjun Kharge's Congress Party, is expected to win just 155 seats (see Figure 1).

1. Opinion poll seat projection for India's 2024 general election



Although a majority in the Lok Sabha is seemingly a formality for the BJP-led NDA, passing legislation in India requires approval at both levels of Parliament. The NDA are four seats short of a majority in the Rajya Sabha (upper house of Parliament) and this could act as a constraint on the speed with which legislation is passed, though it is unlikely to prevent Modi from pushing through his agenda.¹

Modi's key ambitions: manufacturing and trade

One of Modi's key ambitions for his third five-year term as Prime Minister is to grow the manufacturing sector as a share of GVA. Since Modi took office in 2014, the manufacturing sector has accounted for just under 20% of GVA (see Figure 2). This is despite the BJP's 'Make in India' initiative which aims to "transform India into a global design and manufacturing hub".²

One of the key pillars of this initiative is the Production-Linked Incentives (PLI) scheme, which was introduced in 2020. The scheme proposes financial incentives with the goal of boosting domestic manufacturing across 14 key sectors.³ Its introduction was aligned with the release of an updated foreign direct investment (FDI) policy that aims to improve the ease with which foreign companies can invest in India.⁴

¹ The maximum number of members in the Rajya Sabha is 245, however, five seats are currently vacant meaning the upper house consists of 240 members. The NDA holds 117 seats, meaning it is four seats short of a majority. Each Rajya Sabha member serves a six-year term, with elections held every two years and a third of the membership replaced biennially. For further details, see: <https://sansad.in/rs/about/introduction>

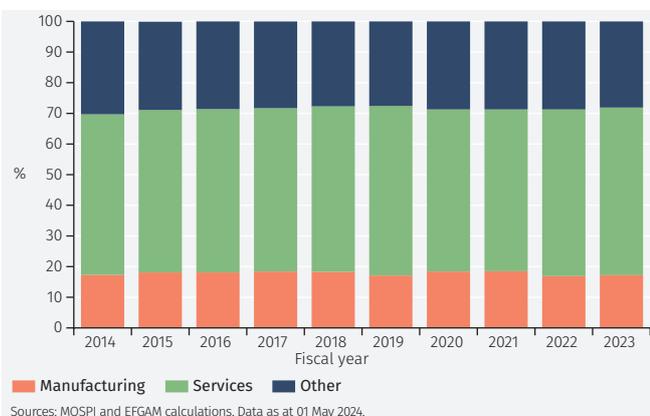
² <https://www.makeinindia.com/index.php/about>

³ <https://www.investindia.gov.in/production-linked-incentives-schemes-india>

⁴ <https://static.investindia.gov.in/2020-10/FDI-PolicyCircular-2020.pdf>

WHAT MODI'S RE-ELECTION MEANS FOR INDIA'S ECONOMY

2. Share of gross value added (constant FY 2011 prices, %) ⁵



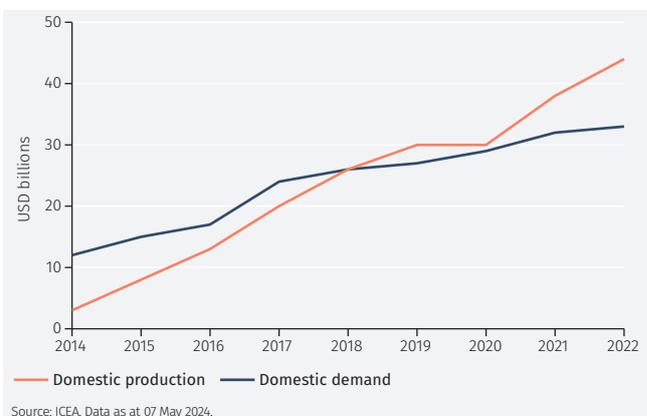
However, the success of these policies is debatable. Although FDI has risen in USD terms since the 'Make in India' initiative was introduced in 2014, it has not risen as a percentage of GDP (see Figure 3). Furthermore, most of the flows have not been into sectors that PLIs focus on. In fact, the PLI sectors accounted for 31% of FDI from fiscal year (FY) 2000 to FY 2013 but their share of FDI dropped to 26% when measured from FY 2000 to FY 2022.⁶ The sectors the Indian government wants to grow may not necessarily be viewed as good investments by foreign investors.

3. Total FDI inflows to India



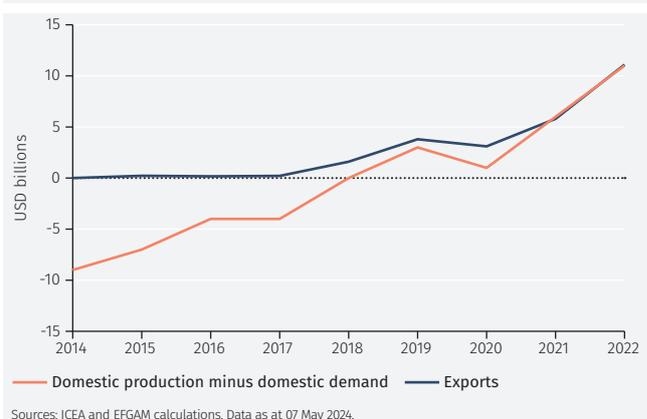
However, there are some sectors for which policy success is clearly visible. Smartphone manufacturing stands out as the most obvious one. Domestic production of smartphones has increased dramatically from USD 3 billion in FY 2014 to USD44 billion in FY 2022 (see Figure 4).

4. Domestic production and demand of mobile phones



This has been accompanied by a rise in India's exports of mobile phones (see Figure 5). Having accounted for around 0.3% in FY 2014, mobile phones now account for around 3.8% of India's total exports.⁷

5. Mobile phones: Domestic production less demand and exports



Yet headwinds remain and there are clear areas for policy improvement in Modi's next five-year term as Prime Minister. Although India's smartphone industry has grown significantly since the introduction of 'Make in India', import tariffs supposed to encourage local sourcing of parts are likely to have increased production cost inefficiencies and reduced productivity.⁸

Tariffs reduce competitiveness in global markets. It is notable, for example, that Vietnam and India accounted for roughly the same share of world mobile phone exports in 2010 but

⁵ Fiscal year 2023 shows second advanced estimate data.

⁶ EFGAM estimates based on data from India's Ministry of Commerce and Industry and Department for Promotion of Industry and Internal Trade. Data as at 19 December 2023.

⁷ Estimates based on data from India's Department of Commerce.

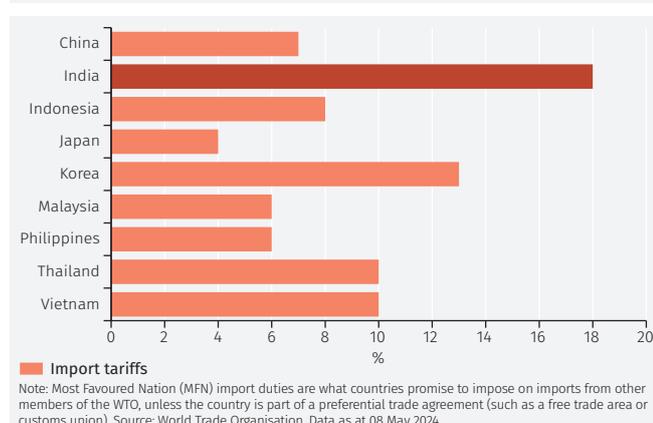
⁸ Khandelwal, A. and Topalova, P. B. (2011) 'Trade Liberalization and Firm Productivity: The Case of India', *The Review of Economics and Statistics*, 93(3), pp. 995-1009. Available at: <https://ssrn.com/abstract=1949292>

WHAT MODI'S RE-ELECTION MEANS FOR INDIA'S ECONOMY

Vietnam's share was over four times greater than India's in 2022.⁹ Over the same period, India's average tariff on mobile phone parts rose by around a third while Vietnam's was unchanged and ended 2022 at almost half the level of India's.¹⁰

It is positive, therefore, that India reduced its import duty on mobile phone components from 15% to 10% at the beginning of 2024.¹¹ But India's high import tariffs are not exclusive to mobile phone parts and it generally has higher tariffs than many other East Asian economies (see Figure 6).

6. Most favoured nation simple average import duty in 2022



The signing of a free trade agreement (FTA) in March 2024 with Iceland, Lichtenstein, Norway and Switzerland represents a step in the right direction.¹² Furthermore, negotiations on FTAs with both the European Union and the UK are currently ongoing.¹³

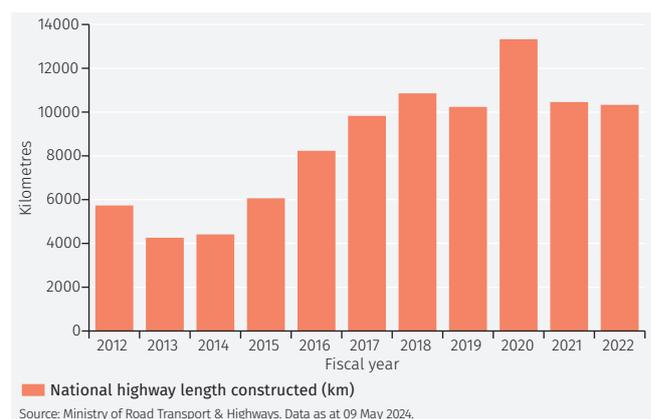
Modi's aim for India's manufacturing sector to account for 25% of GVA by 2025 means it is likely that more PLIs are announced over the next year under a fresh push of the 'Make in India' initiative. The time scale is extremely ambitious but progress in reducing protectionist policies in Modi's third term would reduce production cost inefficiencies and help set India on the right path.

Modi's key ambitions: infrastructure and clean energy

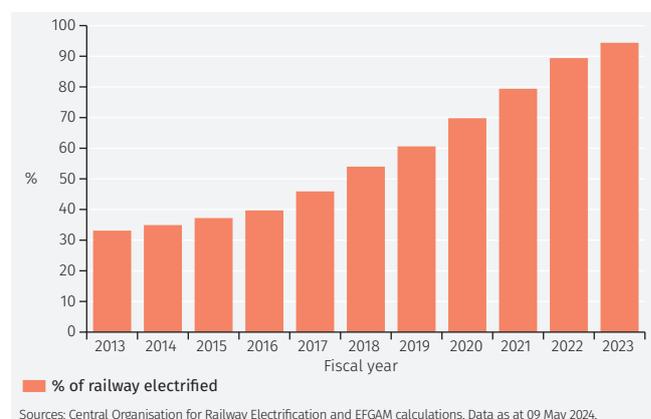
In the BJP's 2019 election manifesto, the party pledged to construct 60,000 km of national highways by 2024 and electrify all railway tracks by 2022.¹⁴ Modi's party has failed to meet these goals.

At the end of 2023 there were 146,145 km of national highways in India, 49,600 km above the level in 2019, and 94% of railways had been electrified by the start of FY 2024.^{15,16} Despite not achieving the targets, the progress compared to the period before Modi was first elected in 2014 is significant (see Figures 7 and 8).

7. National highway length constructed



8. Share of Indian railway electrified



Infrastructure development will remain a key area of focus for Modi in his next five-year term. However, it is not a sustainable policy to keep building roads at the same pace, as the marginal benefit of each additional road diminishes, and there will be no railway left to electrify. The focus is therefore likely to shift.

The BJP aims to expand its network of trains. While most new trains will be electric, India is also producing 35 hydrogen powered trains as part of its 'Hydrogen for Heritage' initiative, with the first one expected to enter service later in 2024.¹⁷

⁹ <https://icea.org.in/blog/wp-content/uploads/2024/01/Tariff-Report-3.0-2-compressed.pdf>

¹⁰ Based on most favoured nation simple average duty data from the World Trade Organisation. Data as at 08 May 2024.

¹¹ <https://taxinformation.cbic.gov.in/view-pdf/1010004/ENG/Notifications>

¹² <https://www.admin.ch/gov/en/start/documentation/media-releases.msg-id-100351.html>

¹³ <https://tinyurl.com/26snrx7k> and <https://tinyurl.com/2v5jr2db>

¹⁴ <https://www.bjp.org/files/2019-10/BJP-Election-english-2019.pdf>

¹⁵ <https://tinyurl.com/9rpk6uw>

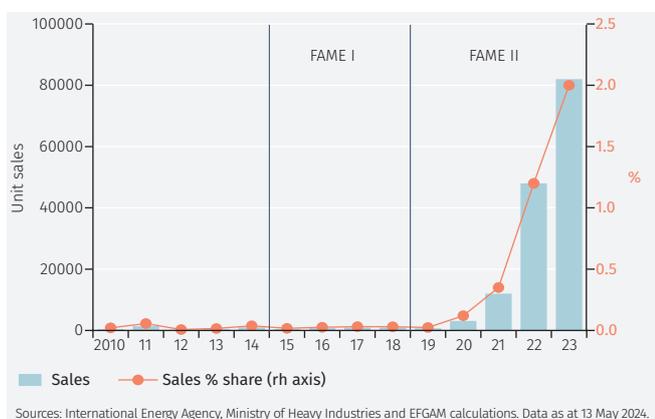
¹⁶ <https://core.indianrailways.gov.in/index.jsp>

¹⁷ <https://pib.gov.in/PressReleasePage.aspx?PRID=1896102>

WHAT MODI'S RE-ELECTION MEANS FOR INDIA'S ECONOMY

And instead of building more roads, India will focus on building more electric vehicles (EVs). Electric cars have a 2% market share in India, less than one fifth of the market share of electric two/three-wheelers, highlighting the potential for growth (see Figure 9).¹⁸ Modi's government approved a new EV policy in March that reduces import costs for foreign EV producers setting up manufacturing in India.¹⁹ Furthermore, it is likely that a third 'Faster Adoption and Manufacturing of Hybrid and Electric Vehicles' (FAME) scheme, which subsidises production and consumption of EVs, is announced in Modi's first third-term budget in July, following the expiry of FAME II in March 2024.²⁰

9. Electric car sales and sales share in India



The infrastructure drive in India forms part of a larger focus on reducing CO2 emissions, with the country having announced a target of achieving net-zero by 2070.²¹ While this is a long-term objective, short-term targets such as increasing the non-fossil fuel energy production capacity to 500 gigawatts (GW) by 2030 are more tangible.

At the end of 2023, India had 188.2 GW of non-fossil fuel energy capacity, a 13.7 GW increase compared to the previous year.²² However, to reach the 500 GW target by 2030, capacity will have to increase by 44.5 GW a year. This is an extremely ambitious target. Indeed, many of Modi's targets are ambitious and often they are not achieved.

The same is likely to be true of Modi's non-fossil fuel energy production capacity target. It is unlikely that this goal is achieved. However, it is likely that there is a significant progress towards it, supported by policy initiatives such as the promotion of solar energy production through the Solar Park Scheme.²³

¹⁸ <https://iea.blob.core.windows.net/assets/aa21aa97-eea2-45b4-8686-ae19d8939161/GlobalEVOutlook2024.pdf>

¹⁹ <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=2014858>

²⁰ <https://fame2.heavyindustries.gov.in/>

²¹ <https://pib.gov.in/PressReleaseIframePage.aspx?PRID=1945472>

²² EFGAM calculations based on data from India's Central Electricity Authority. Data as at 13 May 2024. <https://tinyurl.com/v8cfrees>

²³ <https://cdnbbsr.s3waas.gov.in/s3716e1b8c6cd17b771da77391355749f3/uploads/2023/10/202310051100247622.pdf>

²⁴ <https://tinyurl.com/mu3d9rea>

²⁵ https://labour.gov.in/sites/default/files/ir_as_passed_by_lok_sabha.pdf

²⁶ https://labour.gov.in/sites/default/files/factories_act_1948.pdf

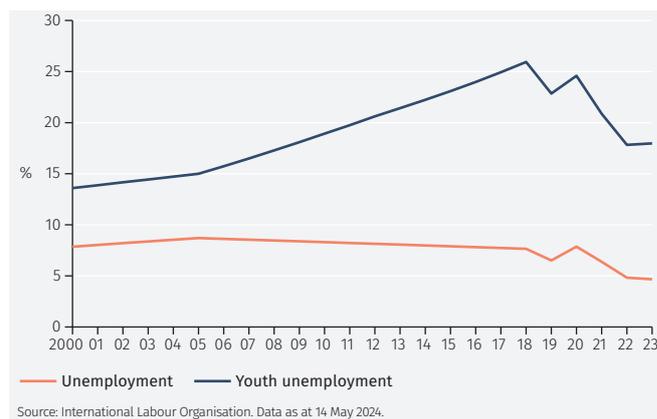
²⁷ https://www.mospi.gov.in/sites/default/files/publication_reports/Quarterly_Bulletin_PLFS_October-December_2023.pdf

²⁸ https://www.lokniti.org/media/PDF-upload/1713766591_47430800_download_report.pdf

Challenges and risks: Youth unemployment, female participation and labour market reforms

Modi faces challenges in his prospective third term. One of them is lowering youth unemployment. While the unemployment rate is relatively low compared to history, youth unemployment is relatively high (see Figure 10).

10. Unemployment and youth unemployment rate



Attempting to draw manufacturing firms to India has failed to generate a significant amount of employment opportunities for younger workers, sometimes leading to social unrest.²⁴ One reason for this may be India's rigid labour laws.

For example, firms with more than 300 employees must request permission from the government to lay off staff.²⁵ This naturally reduces firms' incentives to hire them in the first place. It also has the potential to reduce production efficiency for large firms and represents a labour market rigidity that reduces attractiveness for foreign companies to invest in India.

Additionally, laws dating back to 1948 prevent women from working night shifts or in industries considered dangerous by the government.²⁶ It is unsurprising therefore that male labour force participation was 57.8% at the end of 2023, compared to just 19.9% for females.²⁷ While some states have been loosening restrictions, progress has been slow and national reforms would likely boost labour force participation.

Unemployment is the most prominent concern for voters in India.²⁸ While the recent introduction of the National Education Policy has the long-term potential to make India's labour supply more productive and more attractive to companies,

WHAT MODI'S RE-ELECTION MEANS FOR INDIA'S ECONOMY

shorter-term rewards could be reaped from reforms to outdated labour laws.²⁹ This would boost the attractiveness of India as a destination for foreign firms to establish production bases, helping to generate new jobs, and increasing female labour force participation.

Conclusion

Narendra Modi's re-election for a third term as India's Prime Minister is highly likely to be confirmed on 4 June. Future policy will continue to focus on boosting the manufacturing sector, with new PLIs possible as part of the 'Make in India' initiative. Infrastructure investment with a focus on clean energy is also likely to be a key pillar of the BJP's policies for the next five years.

One of the themes of Modi's first two terms in office has been the setting of ambitious targets that are often not achieved. While this may continue, it is important to note that ambitious targets have often brought with them a significant acceleration in progress towards the government's goals. In addition, there are simple reforms such as reducing protectionist policies and updating outdated labour laws that could increase the effectiveness of existing policies while helping tackle challenges related to youth unemployment and female participation.

From 2014 to 2023, the MSCI India equity index in USD had a compound annual growth rate of 10.1% compared to 3.0% for the MSCI emerging market equity index in USD.³⁰ India's market is one we are optimistic about in the long term, supported by projections of real GDP growth of around 6% per annum for the next five years.³¹ In our view, Modi's re-election is likely to be positive for markets, signalling continuity in policies supportive of Indian companies involved in manufacturing and infrastructure development. While it should be acknowledged that there is room for policy improvement, India remains on the right path for a prosperous future.

²⁹ See EFGAM *InFocus*, 'India: A light in a dimming global economy' (September 2023) <https://tinyurl.com/3eze57ry>

³⁰ EFGAM calculations on data from LSEG Data & Analytics. Data as at 01 January 2024. Note that past performance is not indicative of future results.

³¹ See also EFGAM *InFocus* 'India: A light in a dimming global economy' (September 2023) <https://tinyurl.com/3eze57ry>

Important disclaimers

This document has been produced by EFG Asset Management (UK) Limited for use by the EFG International ("EFG Group" or "EFG") worldwide subsidiaries and affiliates within the EFG Group. EFG Asset Management (UK) Limited is authorised and regulated by the UK Financial Conduct Authority, registered no. 07389736. Registered address: EFG Asset Management (UK) Limited, Park House, 116 Park Street, London W1K 6AP, United Kingdom, telephone +44 (0)20 7491 9111.

This document has been prepared solely for information purposes. The information contained herein constitutes a marketing communication and should not be construed as financial research or analysis, an offer, a public offer, an investment advice, a recommendation or solicitation to buy, sell or subscribe to financial instruments and/or to the provision of a financial service. It is not intended to be a final representation of the terms and conditions of any investment, security, other financial instrument or other product or service. The content of this document is intended only for persons who understand and are capable of assuming all risks involved. Further, this document is not intended to provide any financial, legal, accounting or tax advice and should not be relied upon in this regard. The information in this document does not take into account the specific investment objectives, financial situation or particular needs of the recipient. You should seek your own professional advice (including tax advice) suitable to your particular circumstances prior to making any investment or if you are in doubt as to the information in this document.

The information provided in this document is not the result of financial research conducted by EFGAM's research department. Therefore, it does not constitute investment or independent research as defined in EU regulation (such as "MIFID II" or "MIFIR") nor under the Swiss "Directive on the Independence of Financial Research" issued by the Swiss Banking Association or any other equivalent local rules.

The value of investments and the income derived from them can fall as well as rise, and you may not get back the amount originally invested. Past performance is no indicator of future performance. Investment products may be subject to investment risks, involving but not limited to, currency exchange and market risks, fluctuations in value, liquidity risk and, where applicable, possible loss of principal invested.

Although information in this document has been obtained from sources believed to be reliable, no member of the EFG group represents or warrants its accuracy, and such information may be incomplete or condensed. Any opinions in this document are subject to change without notice. This document may contain personal opinions which do not necessarily reflect the position of any member of the EFG group. To the fullest extent permissible by law, no member of the EFG group shall be responsible for the consequences of any errors or omissions herein, or reliance upon any opinion or statement contained herein, and each member of the EFG group expressly disclaims any liability, including (without limitation) liability for incidental or consequential damages, arising from the same or resulting from any action or inaction on the part of the recipient in reliance on this document.

EFG and its employees may engage in securities transactions, on a proprietary basis or otherwise and hold long or short positions with regard to the instruments identified herein; such transactions or positions may be inconsistent with the views expressed in this document.

The availability of this document in any jurisdiction or country may be contrary to local law or regulation and persons who come into possession of this document should inform themselves of and observe any restrictions. This document may not be reproduced, disclosed or distributed (in whole or in part) to any other person without prior written permission from an authorised member of the EFG group.

Financial intermediaries/independent asset managers who may be receiving this document confirm that they will need to make their own independent decisions and in addition shall ensure that, where provided to end clients/investors with the permission from the EFG Group, the content is in line with their own clients' circumstances with regard to any investment, legal, regulatory, tax or other considerations. No liability is accepted by the EFG Group for any damages, losses or costs (whether direct, indirect or consequential) that may arise from any use of this document by the financial intermediaries/independent asset managers, their clients or any third parties. Comparisons to indexes or benchmarks in this material are being provided for illustrative purposes only and have limitations because indexes and benchmarks have material characteristics that may differ from the particular investment strategies that are being pursued by EFG and securities in which it invests.

The information and views expressed herein at the time of writing are subject to change at any time without notice and there is no obligation to update or remove outdated information.

Independent Asset Managers: in case this document is provided to Independent Asset Managers ("IAMs"), it is strictly forbidden to be reproduced, disclosed or distributed (in whole or in part) by IAMs and made available to their clients and/or third parties. By receiving this document IAMs confirm that they will need to make their own decisions/judgements about how to proceed and it is the responsibility of IAMs to ensure that the information provided is in line with their own clients' circumstances with regard to any investment, legal, regulatory, tax or other consequences. No liability is accepted by EFG for any damages, losses or costs (whether direct, indirect or consequential) that may arise from any use of this document by the IAMs, their clients or any third parties.

If you have received this document from any affiliate or branch referred to below, please note the following:

Bahamas: EFG Bank & Trust (Bahamas) Ltd is licensed by the Securities Commission of the Bahamas pursuant to the Securities Industry Act, 2011 and Securities Industry Regulations, 2012 and is authorised to conduct securities business in and from The Bahamas including dealing in securities, arranging dealing in securities, managing securities and advising on securities. EFG Bank & Trust (Bahamas) Ltd is also licensed by the Central Bank of The Bahamas pursuant to the Banks and Trust Companies Regulation Act, 2000 as a Bank and Trust company. Registered office: Goodman's Bay Corporate Centre West Bay Street and Sea View Drive, Nassau, The Bahamas.

Bahrain: EFG AG Bahrain is a branch of EFG Bank AG as licensed by the Central Bank of Bahrain (CBB) as Investment Business Firm Category 2 and is authorised to carry out the following activities: a) Dealing in financial instruments as agents; b) Arranging deals in financial instruments; c) Managing financial instruments; d) Advising on financial Instruments; e) Operating a Collective Investment Undertaking; and f) Arranging Credit and Advising on Credit. Registered address: EFG AG Bahrain Branch, Manama / Front Sea / Block 346 / Road 4626 / Building 1459 / Office 1401 / P O Box 11321 Manama -- Kingdom of Bahrain.

Cayman Islands: EFG Bank AG, Cayman Branch (the "Branch") is a Registered Person under the Cayman Islands Monetary Authority (CIMA) Securities Investment Business Act (as revised) ("the Securities Act") and its accompanying regulations. The Branch is permitted to provide securities investment services to high net worth and sophisticated persons, as defined in Schedule 4 of the Securities Act, in and from within the Cayman Islands including dealing in securities, arranging dealing in securities, managing securities, and advising on securities. The Branch is also licensed by CIMA pursuant to the Banks and Trust Companies Act (as revised) ("the Banking Act") as a Category B Bank to provide banking services in accordance with Section 6 (6) of the Banking Act. Registered Office: Suite 3208, 9 Forum Lane, Camana Bay, Grand Cayman KY1-1003, Cayman Islands.

Cyprus: EFG Cyprus Limited is an investment firm established in Cyprus with company No. HE408062, having its registered address at Kennedy 23, Globe House, 6th Floor, 1075, Nicosia, Cyprus. EFG Cyprus Limited is authorised and regulated by the Cyprus Securities and Exchange Commission (CySEC).

Dubai: EFG (Middle East) Limited is regulated by the DFSA. This material is intended "for professional clients only". Registered address: EFG (Middle East) Limited DIFC, Gate Precinct 5, 7th Floor PO Box 507245 - Dubai, UAE.

Greece: EFG Bank (Luxembourg) S.A., Athens Branch is a non-booking establishment of EFG Bank (Luxembourg) S.A. which is authorised to promote EFG Bank (Luxembourg) S.A.'s products and services based on the EU freedom of establishment pursuant to a license granted by the Luxembourg financial supervisory authority "CSSF". Registered address: 342 Kifisias Ave. & Ethnikis Antistaseos Str. - 154 51 N. Psychiko, General Commercial Registry no. 143057760001.

Hong Kong: EFG Bank AG, Hong Kong branch (CE Number: AFV863) ("EFG Hong Kong") is authorized as a licensed bank by the Hong Kong Monetary Authority pursuant to the Banking Ordinance (Cap. 155, Laws of Hong Kong) and is authorized to carry out Type 1 (dealing in securities), Type 4 (advising on securities) and Type 9 (asset management) regulated activities in Hong Kong. Registered address: EFG Bank AG Hong Kong branch, 18th floor, International Commerce Centre, 1 Austin Road West, Kowloon, Hong Kong. To the fullest extent permissible by law and the applicable requirements to EFG Hong Kong under the Code of Conduct for Persons Licensed by or Registered with the Securities and Futures Commission, EFG Hong Kong shall not be responsible for the consequences of any errors or omissions herein, or of any information or statement contained herein. EFG Hong Kong expressly disclaims any liability, including (without limitation) liability for incidental or consequential damages, arising from the same or resulting from any action or inaction on the part of the recipient in reliance on this document.

Israel: EFG Wealth Management (Israel) Ltd. Registered Office: 3 Rothschild Blv, Tel Aviv 6688106, Israel.

Jersey: EFG Private Bank Limited, Jersey Branch having its principal place of business at 5th Floor, 44 Esplanade, Jersey, JE1 3FG is regulated by the Jersey Financial Services Commission (JFSC registration number: RBN32518) and is a branch of EFG Private Bank Limited. EFG Private Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority (UK FCA registered no 144036) and Prudential Regulation Authority. EFG Private Bank Limited is registered in England and Wales no 2321802. UK registered office: Park House, 116 Park Street London W1K 6AP United Kingdom, telephone +44 (0)20 7491 9111. The services of EFG Private Bank Limited, Jersey Branch are carried out under and in accordance with the rules of the Jersey Financial Services Commission and where appropriate the rules of the Financial Conduct Authority and Prudential Regulation Authority.

Liechtenstein: EFG Bank von Ernst AG is regulated by the Financial Market Authority Liechtenstein. Registered address: EFG Bank von Ernst AG Egertastrasse 10 - 9490 Vaduz, Liechtenstein.

Luxembourg: EFG Bank (Luxembourg) S.A. is authorised by the Ministry of Finance Luxembourg and supervised by the Commission de Surveillance du Secteur Financier (CSSF). EFG Bank (Luxembourg) S.A. is Member of the Deposit Guarantee Fund Luxembourg (F.G.D.L. - Fonds de Garantie des Dépôts Luxembourg) and Member of the Luxembourg Investor Compensation Scheme (S.I.L.L. - Système d'Indemnisation des Investisseurs Luxembourg). R.C.S. Luxembourg no. B113375. Registered address: EFG Bank (Luxembourg) S.A. - 56, Grand-Rue, L-1660 Luxembourg.

Portugal: EFG Bank (Luxembourg) S.A. - Sucursal em Portugal is authorised and supervised by Banco de Portugal (register 280) and the CMVM, the Portuguese securities market commission, (register 393) for the provision of financial advisory and reception and transmission of orders. EFG Bank (Luxembourg) S.A. - Sucursal em Portugal is a non-booking branch of EFG Bank (Luxembourg) S.A., a public limited liability company incorporated under the laws of the Grand Duchy of Luxembourg, authorised and supervised by the CSSF (Commission de Surveillance du Secteur Financier). Lisbon Head Office: Avenida da Liberdade n.º 131 - 6.º Dto., 1250 - 140 Lisboa. Porto Agency: Avenida da Boavista, n.º 1837 - Escritório 6.2, 4100-133 Porto. Companies Registry Number: 980649439.

Monaco: EFG Bank (Monaco) SAM is a Monegasque Limited Company with a company registration no. 90 S 02647 (Répertoire du Commerce et de l'Industrie de Monaco). EFG Bank (Monaco) SAM is a bank with financial activities authorised and regulated by the "Autorité de Contrôle Prudentiel et de Résolution" (French Prudential Supervision and Resolution Authority and by the "Commission de Contrôle de Activités Financières" (Monegasque Commission for the Control of Financial Activities). Registered address: EFG Bank (Monaco) SAM, Villa les Aigles, 15, avenue d'Ostende - BP 37 - 98001 Monaco (Principauté de Monaco), telephone: +377 93 15 11 11. The recipient of this document is perfectly fluent in English and waives the possibility to obtain a French version of this publication.

People's Republic of China ("PRC"): EFG Bank AG Shanghai Representative Office is approved by China Banking Regulatory Commission and registered with the Shanghai Administration for Industry and Commerce in accordance with the Regulations of the People's Republic of China for the Administration of Foreign-invested Banks and the related implementing rules. Registration No: 310000500424509. Registered address: Room 65T10, 65 F, Shanghai World Financial Center, No. 100, Century Avenue, Pudong New Area, Shanghai. The business scope of EFG Bank AG Shanghai Representative Office is limited to non-profit making activities only including liaison, market research and consultancy.

Singapore: EFG Bank AG, Singapore branch (UEN No. T03FC63711) is licensed as a wholesale bank by the Monetary Authority of Singapore pursuant to the Banking Act 1970, an Exempt Financial Adviser as defined in the Financial Advisers Act 2001 and an Exempt Capital Markets Services Entity under the Securities and Futures Act 2001. This advertisement has not been reviewed by the Monetary Authority of Singapore. Registered address: EFG Bank AG Singapore Branch, 79 Robinson Road, #18-01, Singapore 068897. This document does not have regard to the specific investment objectives, financial situation or particular needs of any specific person. This document shall not constitute investment advice or a solicitation or recommendation to invest in this investment or any products mentioned herein. EFG Singapore and its respective officers, employees or agents make no representation or warranty or guarantee, express or implied, as to, and shall not be responsible for, the accuracy, reliability or completeness of this document, and it should not be relied upon as such. EFG Singapore expressly disclaims any liability, including (without limitation) liability for incidental or consequential damages, arising from the same or resulting from any action or inaction on the part of the recipient in reliance on this document. You should carefully consider the merits and the risk inherent in this investment and based on your own judgement or the advice from such independent advisors whom you have chosen to consult, evaluate whether the investment is suitable for you in view of your risk appetite, investment experience, objectives, financial resources and circumstances, and make such other investigation as you consider necessary and without relying in any way on EFG Singapore.

Switzerland: EFG Bank AG, Zurich, including its Geneva and Lugano branches, is authorised and regulated by the FINMA. Registered Office: EFG Bank AG, Bleicherweg 8, 8001 Zurich, Switzerland. Registered Swiss Branches: EFG Bank SA, 24 quai du Seujet, 1211 Geneva 2, and EFG Bank SA, Via Magatti 2, 6900 Lugano.

United Kingdom: EFG Private Bank Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. EFG Private Bank Limited is a member of the London Stock Exchange. Registered company no. 02321802. Registered address: EFG Private Bank Limited, Park House, 116 Park Street, London W1K 6AP, United Kingdom, telephone +44 (0)20 7491 9111.

USA:

EFG Asset Management (Americas) Corp ("EFGAM Americas") is a U.S. Securities and Exchange Commission ("SEC") registered investment adviser providing investment advisory services. Registration with the SEC or any state securities authority does not imply any level of skill or training. EFGAM Americas may only transact business or render personalized investment advice in those states and international jurisdictions where it is registered, has notice filed, or is otherwise excluded or exempted from registration requirements. An investor should consider his or her investment objectives, risks, charges and expenses carefully before investing. For more information on EFGAM Americas, its business practices, background, conflict of interests, fees charged for services and other relevant information, please visit the SEC's public investor information site at: <https://www.investor.gov>. Also, you may visit: <https://adviserinfo.sec.gov/firm/summary/158905>. In both of these sites you may obtain copies of EFGAM Americas's most recent Form ADV Part 1, Part 2 and Form CRS. EFGAM Americas Registered address: 701 Brickell Avenue, Suite 1350 - Miami, FL 33131.

EFG Capital International Corp. ("EFG Capital") is a U.S. Securities and Exchange Commission ("SEC") registered broker-dealer and member of the Financial Industry Regulatory Authority ("FINRA") and the Securities Investor Protection Corporation ("SIPC"). Securities products and brokerage services are provided by EFG Capital. None of the SEC, FINRA or SIPC, have endorsed this document or the services and products provided by EFG Capital and its U.S. based affiliates. Registered address: 701 Brickell Avenue, Ninth Floor & Suite 1350 - Miami, FL 33131. EFG Capital and EFGAM Americas are affiliated by common ownership under EFGI and maintain mutually associated personnel. The products and services described herein have not been authorized by any regulator or supervisory authority, and further are not subject to supervision by any regulatory authority outside of the United States. Please note the content herein was produced and created by EFG Bank AG/EFG Asset Management (UK) Limited (as applicable). This material is not to be construed as created or otherwise originated from EFG Capital or EFGAM Americas. Neither EFGAM Americas nor EFG Capital represent themselves as the underlying manager or investment adviser of this Fund/ product or strategy. EFG Asset Management (North America) Corp. ("EFGAM NA") is a US Securities and Exchange Commission (SEC) Registered Investment Adviser For more information on EFGAM NA Corp, its business, affiliations, fees, disciplinary events, and possible conflicts of interests please visit the SEC Investment Advisor Public Disclosure website (<https://adviserinfo.sec.gov/>) and review its Form ADV.

Information for investors in Australia:

For Professional, Institutional and Wholesale Investors Only.

This document has been prepared and issued by EFG Asset Management (UK) Limited, a private limited company with registered number 7389736 and with its registered office address at Park House, Park Street, London W1K 6AP (telephone number +44 (0)20 7491 9111). EFG Asset Management (UK) Limited is regulated and authorized by the Financial Conduct Authority No. 536771.

EFG Asset Management (UK) Limited is exempt from the requirement to hold an Australian financial services licence in respect of the financial services it provides to wholesale clients in Australia and is authorised and regulated by the Financial Conduct Authority of the United Kingdom (FCA Registration No. 536771) under the laws of the United Kingdom which differ from Australian laws.

This document is personal and intended solely for the use of the person to whom it is given or sent and may not be reproduced, in whole or in part, to any other person.

ASIC Class Order CO 03/1099

EFG Asset Management (UK) Limited notifies you that it is relying on the Australian Securities & Investments Commission (ASIC) Class Order CO 03/1099 (Class Order) exemption (as extended in operation by ASIC Corporations (Repeal and Transitional Instrument 2016/396) for UK Financial Conduct Authority (FCA) regulated firms which exempts it from the requirement to hold an Australian financial services licence (AFSL) under the Corporations Act 2001 (the Corporations Act) in respect of the financial services we provide to you.

UK Regulatory Requirements

The financial services that we provide to you are regulated by the FCA under the laws and regulatory requirements of the United Kingdom which are different to Australia. Consequently any offer or other documentation that you receive from us in the course of us providing financial services to you will be prepared in accordance with those laws and regulatory requirements. The UK regulatory requirements refer to legislation, rules enacted pursuant to the legislation and any other relevant policies or documents issued by the FCA.

Your Status as a Wholesale Client

In order that we may provide financial services to you, and for us to comply with the Class Order, you must be a 'wholesale client' within the meaning given by section 761G of the Corporations Act. Accordingly, by accepting any documentation from us prior to the commencement of or in the course of us providing financial services to you, you:

- warrant to us that you are a 'wholesale client';
- agree to provide such information or evidence that we may request from time to time to confirm your status as a wholesale client;
- agree that we may cease providing financial services to you if you are no longer a wholesale client or do not provide us with information or evidence satisfactory to us to confirm your status as a wholesale client;

and agree to notify us in writing within 5 business days if you cease to be a 'wholesale client' for the purposes of the financial services that we provide to you.

© EFG. All rights reserved