ADCB SICAV FUNDS – BENCHMARK CONTINGENCY PLAN

In accordance with Article 28(2) of Regulation (EU) 2016/1011 (Benchmarks Regulation), ADCB SICAV (the **"Fund"**) has adopted a contingency plan setting out the actions it will take if any benchmark used in the prospectus of the Fund materially changes or ceases to be provided.

1 Objective

To ensure continuity in the implementation of the investment strategy of the different compartments of the Fund in the event of the unavailability or material change of any benchmark used.

2 Monitoring

The Fund will regularly monitor:

- The registration status of benchmark administrators in the ESMA Benchmark Register
- The compliance of all benchmarks used with the Benchmarks Regulation

3 Fallback Measures

Upon activation of the plan:

- The Fund will replace the affected benchmark with a pre-identified alternative benchmark that complies with the Benchmarks Regulation and best aligns with the investment strategy of the relevant compartment
- The list of alternative benchmarks corresponding to each benchmark currently used is set out in **appendix 1** of this document
- If no suitable alternative benchmark is available, the Fund may adjust the investment strategy accordingly, subject to any required regulatory approvals

4 Trigger Events

This contingency plan will be activated if:

- A benchmark is removed from the ESMA register
- The benchmark administrator loses its authorization, endorsement, or recognition status
- A benchmark is permanently discontinued or materially changed

5 Governance

Decisions to activate the contingency plan and to select or remove a benchmark are made by the Board of Directors of the Fund, in collaboration with the service providers of the Fund, and are subject to prior approval by the relevant regulatory authority when such changes require an amendment to the prospectus.

6 Communication

Any material changes relating to benchmarks, including replacement or removal, will be notified to investors in a timely manner and implemented only after obtaining the necessary approval from the regulatory authority and the appropriate licenses from the benchmark administrators, where necessary.

Appendix 1 – List of funds with corresponding benchmarks

Sub-Fund	Benchmark Name	Benchmark Administrator	Alternative Benchmark Name	Benchmark Administrator
ADCB UAE Equity Fund	S&P UAE Domestic 4.5/9/35 Capped Index NTR	Standard & Poor's	MSCI UAE NTR Index	MSCI
ADCB Islamic GCC Equity Fund	S&P GCC Composite Shariah LMC 4.9/9/35 Capped Index NTR	Standard & Poor's	MSCI GCC Islamic NTR Index	MSCI
ADCB MultiAsset Cautious Fund	Bloomberg Barclays Global Aggregate TR Hedged USD index	Bloomberg Index Services Limited	Bloomberg Global Aggregate Treasuries TR Hedged USD index	Bloomberg Index Services Limited
	S&P Global Large Mid Cap Index	Standard & Poor's	S&P World Index NTR	Standard & Poor's
	HFRX Global Hedged Fund index	Hedge Fund Research, Inc	Bloomberg All Hedge Fund Index	Bloomberg Index Services Limited
ADCB MultiAsset Balanced Fund	Bloomberg Barclays Global Aggregate TR Hedged USD index	Bloomberg Index Services Limited	Bloomberg Global Aggregate Treasuries TR Hedged USD index	Bloomberg Index Services Limited
	S&P Global Large Mid Cap Index	Standard & Poor's	S&P World Index NTR	Standard & Poor's
	HFRX Global Hedged Fund index	Hedge Fund Research, Inc	Bloomberg All Hedge Fund Index	Bloomberg Index Services Limited
ADCB MultiAsset Aggressive Fund	Bloomberg Barclays Global Aggregate TR Hedged USD index	Bloomberg Index Services Limited	Bloomberg Global Aggregate Treasuries TR Hedged USD index	Bloomberg Index Services Limited
	S&P Global Large Mid Cap Index	Standard & Poor's	S&P World Index NTR	Standard & Poor's
	HFRX Global Hedged Fund index	Hedge Fund Research, Inc	Bloomberg All Hedge Fund Index	Bloomberg Index Services Limited