For Professional Clients MiFID Directive 2014/65/EU Annex II) only. No distribution to private/retail investors. For Qualified Investors (Art. 10 Para. 3 of the Swiss Federal Collective Investment Schemes Act (CISA)). Australia: Outside the U.S. and Canada, for Professional Investors only. In the U.S. and Canada, for Institutional and Registered representative use only. Not for public viewing or distribution.



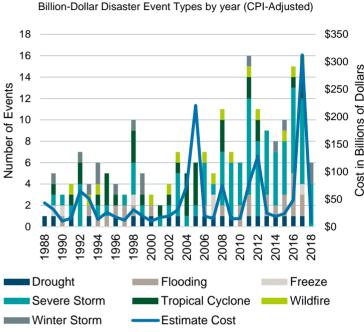
Thought Leadership Paper | September 2018 | Jessica Elengical - Head of ESG Research, Alternatives

FROM THE FRONT LINES OF REAL ESTATE

A practitioner's perspective on physical climate risk

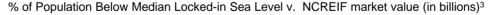
Many of the coastal real estate markets that have commanded the most interest from institutional investors are now increasingly the focus of discussion when it comes to physical climate risk. And while the topic of natural disaster risk is intrinsic to the way real estate is managed, the risks management tools of the past, such as flood insurance or disaster recovery plans may not consider the long-term impact of climate change and how that could fundamentally change the landscape of real estate investment. Recent disasters have further catalyzed the conversation as the frequency and intensity of these events have grown. In 2017, the U.S. faced a record breaking year, one of the most expensive on record in terms of insured losses, and, according to Munich Reinsurance, the costliest hurricane season in history.¹

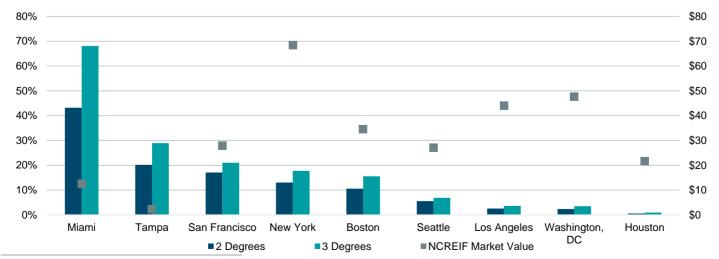
Alongside these acute disasters already occurring is future implications of potential sea level rise, which could permanently redraw flood maps. For instance, according to a 2017 study published in the journal Scientific Reports, the occurrence of a once in 50 year flood could double in frequency in the next few decades due to sea level rise.² Over time, the amount of property that is below mean sea level could increase significantly, with much of the risk prevalent in coastal markets. The below chart plots the percentage of the population of each city living in areas that would be locked into a long-term future below sea level based on a two or three degree temperature rise v. the current value of NCREIF institutional investment in that market.



Source: National Oceanic and Atmospheric Administration, July 2018.

While there is a growth in acceptance of the physical risk aspect of climate change, the challenge has been to understand what the implications of climate risk are within real estate and how to translate a risk assessment into actionable intelligence for an investor. To do so, we need to break down the components of real estate value and develop specific solutions to address them.





¹Munich Re, "Hurricanes cause record losses in 2017 - The year in figures," April 2018
²Vitousek, et al., "Doubling of coastal flooding frequency within decades due to sea-level rise," Scientific Reports, May 2018 ³DWS, NCREIF based on latest data available as of August 2018), and Strauss, B. H., Kulp, S. and Levermann, A. 2015. Mapping Choices: Carbon, Climate, and Rising Seas, Our Global Legacy. Climate Central Research Report. pp. 1-38. The information herein reflects our current views only, are subject to change, and are not intended to be promissory or relied upon by the reader. There can be no certainty that events will turn out as we have opined herein. No assurance can be given that any forecast, target or opinion will materialize. Forecasts are based on assumptions, estimates, or analyses, which might prove incorrect.

Climate risk and the drivers of real estate value

At its essence, real estate valuation is driven by three components (revenues, expenses and cap rates), and the impact of physical climate risk appears in all three.

On the revenue side, the potential of persistent flooding or increased natural disasters could affect tenant demand, heightening occupancy risk and impairing rental growth prospects. These two issues have a risk and relative value implication where a portion of a city or even a specific building is more exposed to flooding than another. A recent study by professors at Harvard University found that within Miami, the rates of appreciation of single-family homes in low lying areas has lagged those in high elevation areas, supporting the thesis that property values can be impacted where persistent flooding is an issue.³

The impacts on the expense side of the ledger could include higher insurance costs, greater deductibles, and greater operating expenses where repairs are not covered by insurance. In addition, significant capital investments could be needed to mitigate risk (e.g. flood walls) or to address long-term damage such as mold remediation.

Physical Risks



Extreme Precipitation



Heat Stress





Sea Level Rise



Wildfires



Finally, while a real estate owner may not hold a property forever, long-term changes due to climate risk are still embedded into the components of the valuation via the terminal value or the cap rate. As long-term migration impacts cities or cities face significant economic deterioration, there could be implications to the value of a potential sale of properties in that city. In Puerto Rico, where long-term emigration has persisted in the city for more than a decade, the government projects that Hurricane Maria could result in an additional 200,000 residents permanently leaving the territory by the end of 2018.⁴

The myths and realities of climate change

One impediment to taking action on climate change is the prevalence of common myths around how to assess and manage risk.

Myth 1: Property and/or flood insurance will protect my building against physical climate risk.

While insurance is an important tool to manage losses, it is only one piece of the puzzle to mitigate exposure. Additionally, premiums can rise after a natural disaster. Finally, as climate models change so do risk models, which could affect the insurance requirements and insurability of the property. For example, after the 2016 California wildfires, insurance premiums on residential homes rose, and more than 10,000 policies were not renewed in fire hazard areas. A year later, insured losses from wildfires rose to \$12 billion and, this year, the state experienced the largest fire in its history. Accordingly, there is a potential risk to home owners for further coverage losses or significant premium increases.

Myth 2: A climate assessment is a ranking of cities most at risk for natural disaster, mainly those cities in coastal markets.

From an infrastructure perspective, city risk and preparedness are two sides of the same coin, and real estate investors should consider the net risk of the city when thinking of the impact of physical climate risk. How is the city investing in mitigation, and what are their plans on protecting and recovering key infrastructure? In the wake of Hurricane Sandy, the City of New York announced a \$20

³Keenan, et al., "Climate gentrification: from theory to empiricism in Miami-Dade County, Florida," Environmental Research Letters, April 2018

⁴Hernandes, Arelis. "Exodus from Puerto Rico grows as island struggles to rebound from Hurricane Maria," The Washington Post, March 2018. The information herein reflects our current views only, are subject to change, and are not intended to be promissory or relied upon by the reader. There can be no certainty that events will turn out as we have opined herein. No assurance can be given that any forecast, target or opinion will materialize. Forecasts are based on assumptions, estimates or analyses, which might prove inaccurate or incorrect.

billion plan to invest in resilience projects across the New York City coastline. Key projects include the East Side Coastal Resiliency Project, which will strengthen 2.2 miles of coastline against flooding through a series of levees or berms and other structures designed to protect against storm surge and rising sea levels. While the long-term projects in city budgets today may be difficult for a real estate investor to underwrite, they can be an indicator of relative preparedness and demonstrate a municipality's intent to address climate risk.

Myth 3: You can understand flood risk by looking at a flood map.

While flood maps are important, they do not tell the whole story of physical climate risk and do not look at the potential for developing mitigation and resilience. A building level assessment requires an understand of how well your building is susceptible to hazards now and in the future and what are the specific vulnerabilities in the property. What does a flood map look like today versus 10 or 20 years from now? Where is the building situated relative to the street, and are there protective features such as a curb wall or elevated first floor? Where are the mechanicals? What is the back-up generation? Outside of the building, what type of wetlands or other features at the property can help with stormwater management? How prepared is the local infrastructure to cope with the storm surges?

Addressing climate risk and resilience – a holistic approach

In order for us to understand the impact of physical climate risk on our properties we need get past the pre-conceived notions to take a holistic approach to evaluating properties.

Within DWS, we believe that a framework for integrating Environmental, Social, and Governance (ESG) considerations should touch all parts of the investment process, and we are taking a similar approach to addressing physical climate risk within real estate. At portfolio construction, the goal is to look at exposures today and in the future to develop a picture of portfolio exposure to physical climate risk over the investment horizon. However, we believe this process should be the start and not the end of a climate risk analysis, and it is only beneficial if it leads to actionable intelligence or influences decision-making.



Description: Planned design for the East Side Coastal Resiliency Project⁶ For instance, a portfolio level assessment can also be a tool to help better inform insurance requirements and can help identify and prioritize properties for further investigation.

At the property level, a climate risk and resilience assessment can provide capital and operational recommendations, allowing a manager to improve preparedness and develop a resiliency plan tailored to the building. Perhaps the key challenge is defining the costs and benefits of an investment in resiliency as some of those benefits may not directly accrue to the landlord in terms of operational savings. However, there is anecdotal evidence that resilient design can help to make a property more attractive to current and prospective tenants. In a recent case study published by the Urban Land Institute for a property in south Florida, the developer found that features such as the inclusion of a second back-up generator to maintain operations allowed the building to realize faster lease-up rates versus comparable properties coming to market at the time.⁵

Moving beyond the risk: advocacy and stewardship

While the discussion on climate risk and resiliency often focuses on the impacts to the investor, real estate also plays a role in assisting tenants, the local community and the city itself. As a practical example, a property located on high ground can become a staging area for first responders during a disaster or a resource to the local community in the aftermath of a disaster. It is important for an asset manager to define and provide directions to their local property teams to empower those teams to become stewards of their communities during these events. More broadly, as investors evolve their views on preparing for physical climate risk, they can play a larger role in shaping cities and local infrastructure for the challenges to come.

⁵Urban Land Institute: Returns on Resilience: The Business Case. ULI Center for Sustainability. Washington, D.C.: the Urban Land Institute, 2015

⁶Photo courtesy of the Office of the Mayor The information herein reflects our current views only, are subject to change, and are not intended to be promissory or relied upon by the reader. There can be no certainty that events will turn out as we have opined herein. No assurance can be given that any forecast, target or opinion will materialize.

Forecasts are based on assumptions, estimates or analyses, which might prove inaccurate or incorrect.

IMPORTANT INFORMATION

On March 23, 2018, Deutsche Asset Management rebranded to DWS. The brand DWS represents DWS Group GmbH & Co. KGaA and any of its subsidiaries, such as DWS Distributors, Inc., which offers investment products, or DWS Investment Management Americas, Inc. and RREEF America L.L.C., which offer advisory services.

DWS represents the asset management activities conducted by DWS Group GmbH or any of its subsidiaries. In the U.S., DWS relates to the asset management activities of RREEF America L.L.C.; in Germany: DWS Grundbesitz GmbH, DWS Real Estate GmbH, and DWS Alternatives GmbH; in Australia: Deutsche Investments Australia Limited (ABN 52 074 599 401) an Australian financial services incense holder; in Japan: Deutsche Securities Inc. (For DSI, financial advisory (not investment advisory) and distribution services only); in Hong Kong: Deutsche Bank Aktiengesellschaft, Hong Kong Branch (for direct real estate business), and Deutsche Asset Management (Hong Kong) Limited (for real estate securities business); in Singapore: Deutsche Asset Management (Asia) Limited (Company Reg. No. 198701485N); in the United Kingdom: Deutsche Alternative Asset Management (UK) Limited, Deutsche Alternative Asset Management (Global) Limited and Deutsche Asset Management (UK) Limited and Deutsche Alternative Asset Management (Global) Limited; in addition to other regional entities in the Deutsche Bank Group.

For purposes of ERISA and the Department of Labor's fiduciary rule, we are relying on the sophisticated fiduciary exception in marketing our services and products, and nothing herein is intended as fiduciary or impartial investment advice unless it is provided under an existing mandate.

Key DWS research personnel are voting members of various investment committees. Members of the investment committees vote with respect to underlying investments and/or transactions and certain other matters subjected to a vote of such investment committee. The views expressed in this document have been approved by the responsible portfolio management team and Real Estate investment committee and may not necessarily be the views of any other division within DWS.

This material was prepared without regard to the specific objectives, financial situation or needs of any particular person who may receive it. It is intended for informational purposes only. It does not constitute investment advice, a recommendation, an offer, solicitation, the basis for any contract to purchase or sell any security or other instrument, or for DWS or its affiliates to enter into or arrange any type of transaction as a consequence of any information contained herein. Neither DWS nor any of its affiliates gives any warranty as to the accuracy, reliability or completeness of information which is contained in this document. Except insofar as liability under any statute cannot be excluded, no member of the DWS, the Issuer or any office, employee or associate of them accepts any liability (whether arising in contract, in tort or negligence or otherwise) for any error or omission in this document or for any resulting loss or damage whether direct, indirect, consequential or otherwise suffered by the recipient of this document or any other person.

The views expressed in this document constitute DWS Group's judgment at the time of issue and are subject to change. This document is only for professional investors. This document was prepared without regard to the specific objectives, financial situation or needs of any particular person who may receive it. No further distribution is allowed without prior written consent of the Issuer.

Investments are subject to risk, including market fluctuations, regulatory change, possible delays in repayment and loss of income and principal invested.

The value of investments can fall as well as rise and you might not get back the amount originally invested at any point in time

Investment in real estate may be or become nonperforming after acquisition for a wide variety of reasons. Nonperforming real estate investment may require substantial workout negotiations and/ or restructuring. Environmental liabilities may pose a risk such that the owner or operator of real property may become liable for the costs of removal or remediation of certain hazardous substances released on, about, under, or in its property. Additionally, to the extent real estate investments are made in foreign countries, such countries may prove to be politically or economically unstable. Finally, exposure to fluctuations in currency exchange rates may affect the value of a real estate investment.

Investments in Real Estate are subject to various risks, including but not limited to the following:

- _ Adverse changes in economic conditions including changes in the financial conditions of tenants, buyer and sellers, changes in the availability of debt financing, changes in interest rates, real estate tax rates and other operating expenses;
- _ Adverse changes in law and regulation including environmental laws and regulations, zoning laws and other governmental rules and fiscal policies;
- _ Environmental claims arising in respect of real estate acquired with undisclosed or unknown environmental problems or as to which inadequate reserves have been established;
- _ Changes in the relative popularity of property types and locations;
- _ Risks and operating problems arising out of the presence of certain construction materials; and
- _ Currency / exchange rate risks where the investments are denominated in a currency other than the investor's home currency.

An investment in real estate involves a high degree of risk, including possible loss of principal amount invested, and is suitable only for sophisticated investors who can bear such losses. The value of shares/ units and their derived income may fall or rise.

Any forecasts provided herein are based upon DWS's opinion of the market at this date and are subject to change dependent on the market. Past performance or any prediction, projection or forecast on the economy or markets is not indicative of future performance.

In Australia: Issued by Deutsche Investments Australia Limited (ABN 52 074 599 401), holder of an Australian Financial Services License (AFSL 499 640). This information is only available to persons who are professional, sophisticated, or wholesale investors as defined under section 761 G of the Corporations Act 2001 (Cth). The information provided is not to be construed as investment, legal or tax advice and any recipient should take their own investment, legal and tax advice before investing. Deutsche Investments Australia Limited is an asset management subsidiary of DWS Group GmbH & CO. KGaA ("DWS Group"). The capital value of and performance of an investment is not in any way guaranteed by DWS Group, Deutsche Investments Australia Limited or any other member of the DWS Group. Any forecasts provided herein are based upon our opinion of the market as at this date and are subject to change, dependent on future changes in the market. Any prediction, projection or forecast on the economy, stock market, bond market or the economic trends of the markets is not necessarily indicative of the future or likely performance. Investments are subject to investment risk, including possible delays in repayment and loss of income and principal invested. Deutsche Investments Australia Limited is not an Authorised Deposit-taking Institution under the Banking Act 1959 nor regulated by APRA.

Notice to prospective Investors in Japan: This document is distributed in Japan by DeAMJ. Please contact the responsible employee of DeAMJ in case you have any question on this document because DeAMJ serves as contacts for the product or service described in this document. This document is for distribution to Professional Investors only under the Financial Instruments and Exchange Law.

Dubai International Financial Centre: Deutsche Bank AG in the Dubai International Financial Centre (registered no. 00045) is regulated by the Dubai Financial Services Authority. Deutsche Bank AG - DIFC Branch may only undertake the financial services activities that fall within the scope of its existing DFSA license. Principal place of business in the DIFC: Dubai International Financial Centre, The Gate Village, Building 5, PO Box 504902, Dubai, U.A.E. This information has been distributed by Deutsche Bank AG. Related financial products or services are only available to Professional Clients, as defined by the Dubai Financial Services Authority

Kingdom of Saudi Arabia: Deutsche Securities Saudi Arabia LLC Company, (registered no. 07073-37) is regulated by the Capital Market Authority. Deutsche Securities Saudi Arabia may only undertake the financial services activities that fall within the scope of its existing CMA license. Principal place of business in Saudi Arabia: King Fahad Road, Al Olaya District, P.O. Box 301809, Faisaliah Tower - 17th Floor, 11372 Riyadh, Saudi Arabia.

For Investors in Switzerland: This material is intended for information purposes only and does not constitute investment advice or a personal recommendation. This document should not be construed as an offer to sell any investment or service. Furthermore, this document does not constitute the solicitation of an offer to purchase or subscribe for any investment or service in any jurisdiction where, or from any person in respect of whom, such a solicitation of an offer is unlawful. Neither Deutsche Bank AG nor any of its affiliates, gives any warranty as to the accuracy, reliability or completeness of information which is contained in this document. Past performance or any prediction or forecast is not indicative of future results.

The views expressed in this document constitute DWS Group's judgment at the time of issue and are subject to change. DWS Group has no obligation to update, modify or amend this letter or to otherwise notify a reader thereof in the event that any matter stated herein, or any opinion, projection, forecast or estimate set forth herein, changes or subsequently becomes inaccurate, or if research on the subject company is withdrawn. Prices and availability of financial instruments also are subject to change without notice.

The information provided in this document is addressed solely to Qualified Investors pursuant to Article 10 paragraph 3 of the Swiss Federal Act on Collective Investment Schemes (CISA) and Article 6 of the Ordinance on Collective Investment Schemes. This document is not a prospectus within the meaning of Articles 1156 and 652a of the Swiss Code of Obligations and may not comply with the information standards required thereunder. This document may not be copied, reproduced, distributed or passed on to others without the prior written consent of Deutsche Bank AG or its affiliates.

For investors in the United Kingdom: © 2018 Deutsche Alternative Asset Management (Global) Limited. All rights reserved. No further distribution is allowed without prior written consent of the Issuer.

Issued and approved by Deutsche Alternative Asset Management (Global) Limited of 1 Great Winchester Street, London, EC2N 2DB, authorised and regulated by the Financial Conduct Authority ("FCA"). DeAAM Global is also registered with the U.S. Securities and Exchange Commission under the Investment Advisers Act 1940 (the "Advisers Act"), however it complies with the Advisers Act only with respect to US clients.

This document is a "non-retail communication" within the meaning of the FCA's Rules and is directed only at persons satisfying the FCA's client categorisation criteria for an eligible counterparty or a professional client. This document is not intended for and should not be relied upon by a retail client. This document may not be reproduced or circulated without written consent of the issuer.

This document is intended for discussion purposes only and does not create any legally binding obligations on the part of DWS Group GmbH & Co. KGaA and/or its affiliates ("DWS"). Without limitation, this document does not constitute investment advice or a recommendation or an offer or solicitation and is not the basis for any contract to purchase or sell any security or other instrument, or for DWS to enter into or arrange any type of transaction as a consequence of any information contained herein. The information contained in this document is based on material we believe to be reliable; however, we do not represent that it is accurate, current, complete, or error free. Assumptions, estimates and opinions contained in this document constitute our judgment as of the date of the document and are subject to change without notice. Past performance is not a guarantee of future results. Any forecasts provided herein are based upon our opinion of the market as at this date and are subject to change, dependent on future changes in the market. Any prediction, projection or forecast on the economy, stock market, bond market or the economic trends of the markets is not necessarily indicative of the future or likely performance. Investments are subject to risks, including possible loss of principal amount invested. When making an investment decision, potential investors should rely solely on the final documentation relating to the investment or service and not the information contained herein. The investments or services mentioned herein may not be appropriate for all investors and before entering into any transaction you should take steps to ensure that you fully understand the transaction and have made an independent

assessment of the appropriateness of the transaction in the light of your own objectives and circumstances, including the possible risks and benefits of entering into such transaction. For general information regarding the nature and risks of the proposed transaction and types of financial instruments please go to https://www.db.com/company/en/risk-disclosures.htm. You should also consider seeking advice from your own advisers in making this assessment. If you decide to enter into a transaction with us you do so in reliance on your own judgment.

Any opinions expressed herein may differ from the opinions expressed by other DWS departments including DWS Research. DWS may engage in transactions in a manner inconsistent with the views discussed herein. DWS trades or may trade as principal in the instruments (or related derivatives), and may have proprietary positions in the instruments (or related derivatives) discussed herein. DWS may make a market in the instruments (or related derivatives) discussed herein. Sales and Trading personnel are compensated in part based on the volume of transactions effected by them. The distribution of this document and availability of these products and services in certain jurisdictions may be restricted by law. You may not distribute this document, in whole or in part, without our express written permission.

DWS SPECIFICALLY DISCLAIMS ALL LIABILITY FOR ANY DIRECT, INDIRECT, CONSEQUENTIAL OR OTHER LOSSES OR DAMAGES INCLUDING LOSS OF PROFITS INCURRED BY YOU OR ANY THIRD PARTY THAT MAY ARISE FROM ANY RELIANCE ON THIS DOCUMENT OR FOR THE RELIABILITY, ACCURACY, COMPLETENESS OR TIMELINESS THEREOF.

Any reference to "DWS", "Deutsche Asset Management" or "Deutsche AM" shall, unless otherwise required by the context, be understood as a reference to asset management activities conducted by DWS Group GmbH & Co. KGaA and/or any of its affiliates. Clients will be provided DWS products or services by one or more legal entities that will be identified to clients pursuant to the contracts, agreements, offering materials or other documentation relevant to such products or services. DWS's infrastructure investment business is part of the Alternatives platform. In the U.S., DWS relates to the asset management activities of RREEF America L.L.C.; in Germany: RREEF Investment GmbH, RREEF Management GmbH, and RREEF Spezial Invest GmbH; in Japan: Deutsche Securities Inc. (For DSI, financial advisory (not investment advisory) and distribution services only); in Hong Kong: Deutsche Bank Aktiengesellschaft, Hong Kong Branch (for direct real estate business), and Deutsche Asset Management (Hong Kong) Limited (for real estate securities business); in Singapore: Deutsche Asset Management (Asia) Limited (Company Reg. No. 198701485N); in the United Kingdom: Deutsche Alternative Asset Management (UK) Limited, Deutsche Alternative Asset Management (Global) Limited and Deutsche Asset Management (UK) Limited; and in Denmark, Finland, Norway and Sweden: Deutsche Bank AG; in Australia: Deutsche Investments Australia Limited (ABN 52 074 599 401) an Australian financial services license holder.

For investors in Nordics: Deutsche Bank AG is authorized under German banking law (competent authority: European Central Bank and the BaFin, Germany's Federal Financial Supervisory Authority. Deutsche Bank Branches operates within the EEA on the back of the legal entity (Deutsche Bank AG) EU Passports within the European Economic Area ("EEA"). Reference is made to European Union Regulatory Background and Corporate and Regulatory Disclosures at https://www.db.com/en/content/eu disclosures uk.htm. Details about the extent of our authorisation and regulation by BaFin are available from us on request." DBS is acting for and behalf of Deutsche Asset Management (UK) Ltd and if you decide to enter into a transaction with Deutsche Bank AG or one of its affiliates ("the principal") will any and all contractual and commercial agreements be as entered into with that principal. This presentation is for information purposes only and is not intended to be an offer or an advice or recommendation or solicitation, or the basis for any contract to purchase or sell any security, or other instrument, or for Deutsche Bank to enter into or arrange any type of transaction as a consequence of any information contained herein. It has been prepared without consideration of the investment needs, objectives or financial circumstances of any investor. This document is not intended for and should not be relied upon by a retail client. This material has been deemed falling under the MIFID definition of marketing material as not presented as an objective or independent piece of research in accordance with Article 24 section 1.a (Article 19.2 in directive 2014/65/EU) of implementation directive 2014/65/EU as enacted into Swedish laws and regulations, inter alia Värdepappersmarknadslagen (2007:528), Lagen (1991:980) om handel med finansiella instrument and Chapter 11, Sections 8-9, of regulation FFFS 2007:16, as amended. The views set out in this presentation are those of the author and may not necessarily reflect the views of any other persons or

For investors in Nordics (continued): division within Deutsche Bank, including the Sales and Trading functions of the Corporate and Investment Bank: services provided by the Sales and Trading functions of the Corporate and Investment Bank are purely on a non advised, execution-only basis.

For Investors in Belgium: The information contained herein is only intended for and must only be distributed to institutional and/or professional investors (as defined in the Belgian law of 2 August 2002 on the supervision of the financial sector and the financial services). In reviewing this presentation you confirm that you are such an institutional or professional investor. When making an investment decision, potential investors should rely solely on the final documentation (including the prospectus) relating to the investment or service and not the information contained herein. The investments or services mentioned herein may not be adequate or appropriate for all investors and before entering into any transaction you should take steps to ensure that you fully understand the transaction and have made an independent assessment of the suitability or appropriateness of the transaction in the light of your own objectives and circumstances, including the possible risks and benefits of entering into such transaction. You should also consider seeking advice from your own advisers in making this assessment. If you decide to enter into a transaction with us you do so in reliance on your own judgment.

For investors in Bermuda: This is not an offering of securities or interests in any product. Such securities may be offered or sold in Bermuda only in compliance with the provisions of the Investment Business Act of 2003 of Bermuda which regulates the sale of securities in Bermuda. Additionally, non-Bermudian persons (including companies) may not carry on or engage in any trade or business in Bermuda unless such persons are permitted to do so under applicable Bermuda legislation.