

FINAL PROSPECTUS

ALFM Euro Bond Fund

*19/F, BPI Buendia Center, Sen. Gil J. Puyat Ave., Makati City 1209
Tel No. (02) 580-3566 / 580-3569*

(An Open-end investment company organized under Philippine Laws)

**An Offer of up to the Number of Authorized Shares of
ALFM Euro Bond Fund at an Offer Price of Net Asset Value per Share
on the date of subscription**

	ALFM EURO BOND FUND
Number of Authorized Shares	80,000
Minimum Initial Investment	EUR 500.00
PAR value	PhP 10,000.00

**Securities will be traded over the counter through
SEC Certified Investment Solicitor (CISol) or via online facility**

BPI Investment Management, Inc.
Fund Manager

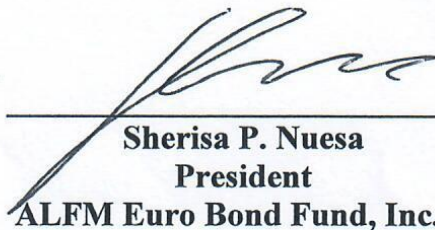
*19/F, BPI Buendia Center, Sen. Gil J. Puyat Ave., Makati City
Tel No. (02) 580-3566 / 580-3569*

BPI Investment Management, Inc., Tel. Nos. (02) 580-3566 / 580-3569
BPI Capital Corporation, Tel. Nos. (02) 845-5695 to 97
First Metro Securities Brokerage Corporation, Tel. No. (02) 859-0600
Distributors

****The date of this PROSPECTUS is May 17, 2019.***

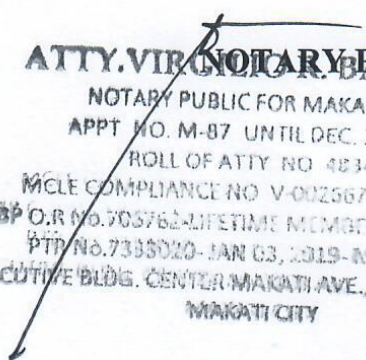
**THESE SECURITIES SHALL BE SOLD AND REDEEMED ONLY THROUGH THE
FUND'S DISTRIBUTORS. THE FUND'S SHARES SHALL NOT BE LISTED NOR
TRADED ON THE PHILIPPINE STOCK EXCHANGE. SHARES OF THE FUND ARE NOT
DEPOSITS OR OBLIGATIONS OF, OR GUARANTEED OR ENDORSED BY, ANY
FINANCIAL INSTITUTION, AND ARE NOT INSURED WITH THE PHILIPPINE
DEPOSIT INSURANCE CORPORATION.**

ALL REGISTRATION REQUIREMENTS HAVE BEEN MET AND ALL INFORMATION CONTAINED HEREIN IS TRUE AND CURRENT.


Sherisa P. Nuesa
President
ALFM Euro Bond Fund, Inc.

SUBSCRIBED AND SWORN TO before me this JUN 06 2019 day of 20. Affiant, Ms. Sherisa P. Nuesa, exhibiting to me her Tax Identification No. 132-204-906.

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Book No. 600
Series of 20 14


ATTY. VIRGILIO A. BATAILLA
NOTARY PUBLIC FOR MAKATI CITY
APPT. NO. M-87 UNTIL DEC. 31, 2020
ROLL OF ATTY NO. 48148
MCLE COMPLIANCE NO. V-0025676/4-11-2018
IBP O.R. NO. 705762-LIFETIME MEMBER JAN 29 2007
PTD NO. 7385020-JAN 03, 2019-MAKATI CITY
EXECUTIVE BLDG. CENTER MAKATI AVE., COR., JUPITER ST.,
MAKATI CITY

ALFM EURO BOND FUND, INC.

SUMMARY OF FEES TO BE DEDUCTED FROM THE FUND	
Total Management Fee based on the average daily trading NAV of the Fund	0.375% p.a.
Management Fee	0.1625% p.a.
Distribution Fee	0.1625% p.a.
Transfer Agent Fee	0.0500% p.a.
Sub-Distribution Fee based on the outstanding daily balance of the Fund's shares distributed	0.1875% p.a.*
Safekeeping Fees based on face/nominal value of the securities at month end for fixed income securities and based on the market value of the portfolio at month end for local equities	
Scripless Securities / Book Entry	
Asset Size: USD 0 – USD 250 Mn	1.50 bps p.a.
Above USD 250 Mn to USD 750 Mn	1.25 bps p.a.
Above USD 750 Mn	1.00 bps p.a.
Physical Securities	PhP 10,000 per month
2017 External Audit Fee	PhP 37,878.40

* shall be taken from the 0.375% p.a. total management fee

OTHER FEES	
Maximum Sales Load, if any, to be collected from the subscribers, based on each amount invested by an applicant or Shareholder	5.0%
Early Redemption Fee based on the amount redeemed	
180 days or less	1.00% flat
more than 180 days	none

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THE OFFER

ALFM Euro Bond Fund

(The Fund is incorporated under the laws of the Republic of the Philippines)

The following summary about the Fund and the Offer is qualified by detailed information appearing elsewhere in this Prospectus. Cross references in this summary are to headings in the Prospectus.

This document relates to an Offer for subscription to the shares of common stock of the ALFM Euro Bond Fund.

An Offer of up to 80,000 shares of common stock of par value PhP10,000.00 each (the “Offer Shares”) in the capital stock of ALFM Euro Bond Fund, Inc. (“ALFM Euro” or the “Fund”) at the Fund’s prevailing Net Asset Value (“NAV”) per Share, denominated in the Euro currency, plus any applicable sales load, on the date of sale of the shares. The Fund may terminate the Offer at any time or when the number of Shares subscribed and paid for has reached 80,000 shares.

The Fund was incorporated on August 5, 2005 as ALFM Euro Fund, Inc. with an authorized capitalization of PhP 200.0 Million consisting of 20,000 shares with par value of PhP10,000 each. On September 6, 2005, the SEC approved the change in the Fund’s name to ALFM Euro Bond Fund, Inc. The authorized capitalization now stands at PhP 800.0 Million consisting of 80,000 shares with par value of PhP10,000.00 each. The Euro is the operational currency of the Fund.

The ALFM Euro Bond Fund, Inc. (“ALFM Euro” or the “Fund”) is a domestic corporation duly authorized to operate as an open-end investment company. The Fund has entered into a Management and Distribution Contract with BPI Investment Management, Inc. authorizing BPI Investment to purchase and sell investment securities for the account of the Fund. The Fund does not have employees of its own since the management and administration functions are already being handled by BPI Investment. The Fund has adopted a Manual of Corporate Governance and an Anti-Money Laundering Operating Manual. Quarterly reporting of the Fund’s operations to the Board of Directors is being performed by BPI Investment to properly identify, assess and manage risks that may arise any time during the Fund’s daily operations. ALFM Euro does not own any property *such as* real estate, plant and equipment, mines, patents, etc. required to be disclosed under Annex C of SRC Rule 12.1.

The investment objective of the Fund is capital preservation with returns and inflows derived from investments in primarily foreign-currency denominated instruments and securities issued by local and foreign entities calculated to give the Fund a steady stream of fixed income. The Fund can be classified as a moderate risk investment and shall have a base currency in Euros.

USE OF PROCEEDS

The total proceeds from the Offer is estimated at EUR 17.29 Million (using EUR 216.13 NAVPS as of May 16, 2019). The Fund’s main business is to invest the proceeds in primarily Euro-denominated fixed-income securities such as, but not limited to, government securities and debt instruments issued by or guaranteed by the Philippine or major foreign governments, Treasury Bills / Notes, foreign currency denominated loans, Certificates of Deposit and other deposit substitutes issued by commercial banks, financial institutions, and supranationals, in line with the Fund’s investment objective. The investments of Fund shall be in, but are not limited to, the following major currencies: Euro, U.S. Dollar, British Pound, Canadian Dollar, Australian Dollar, Swiss Franc, Danish Kroner, and Japanese Yen. Total expenses paid out or projected to be paid out of the gross proceeds are the following: EUR 65 Thousand for management, distribution, advisory and transfer agent fees/other professional fees and filing fee & business registration license of PHP 49 Thousand.

The Fund has entered into a Management and Distribution Contract with BPI Investment Management, Inc. authorizing BPI Investment to purchase and sell investment securities for the account of the Fund. Services include the investment and re-investment of the cash and other assets and the purchase and sale of securities which will form part of the investment portfolio of the Fund, in accordance with the investment policies or

guidelines which the Board of Directors of the Fund may from time to time prescribe and in conformity with the Fund's Articles of Incorporation and By-Laws as may be amended from time to time, the Investment Company Act, and other applicable laws and regulations.

THE OFFER SHARES

All of the Shares in issue or to be issued pursuant to the Offer have, or upon issue will have, identical rights and privileges. These are outlined in the section on "Description of Capital Stock" (page 20). The Offer Shares may be owned by any person regardless of citizenship or nationality, subject to the subsection on "Eligible Investors" under the section headed "Terms and Conditions of the Offers" (page 17). The liability of the shareholders is limited to their investment to the company.

Prospective investors in the Fund should carefully consider the matters addressed under "Risk Factors and Risk Monitoring and Management" (page 11) before making an investment. These risks include, but are not limited to, market risk, interest rate risk, liquidity risk, credit risk, inflation risk, reinvestment risk, foreign exchange risk, and the risk that the value of the Funds are **not** guaranteed and **not** insured with the Philippine Deposit Insurance Corporation.

REDEMPTIONS

The Fund is ready to redeem, at the applicable Net Asset Value per Share, all or any part of the Shares standing in the name of a Shareholder in the Fund. Unless redeemed earlier than the minimum holding period of 180 days when an Early Redemption Fee of 1% will apply, there is no redemption fee.

TOTAL EXPENSES OF THE FUNDS

The total expenses paid out or projected to be paid out of the gross proceeds of the Offer include, but are not limited to, filing fees, registration fees, legal research fees, business registration licenses, notarial fees, legal opinion and assistance fees, external auditor's fees, and management, distribution, advisory and transfer agent fees.

RESTRICTIONS ON THE USE OF PROCEEDS

No other funds outside the proceeds of this Offer shall be needed to accomplish the Fund's investment objectives. There is no material amount of the proceeds of these Offers that is to be used to discharge any debt, acquire assets or finance the acquisition of other businesses, or to reimburse any director, shareholder, officer, or employee of the Fund for services rendered, assets previously transferred, or money loaned or advanced.

VALUATION

The Fund's investments are valued marked-to-market pursuant to Philippine Accounting Standards ("PAS") Nos. 32 and Philippine Financial Reporting Standards ("PFRS") No. 9 and other amendments to the said standards. Under PFRS No. 9 which became effective on January 1, 2018, the Fund's financial assets are classified under (i) fair value through profit or loss, (ii) fair value through other comprehensive income, or (iii) hold-to-collect securities. The NAVPS of the Fund may fluctuate (i.e., go down or go up) due to changes in the market values of the Fund's investments and/or, in the case of foreign currency denominated funds, changes in the Euro-Peso exchange rates. Such changes in market values may also be attributable to various factors. See "Risk Factors and Risk Monitoring and Management".

OFFERING PRICE

The offering price of the shares is the Fund's prevailing NAV per Share computed as of end-of-day on the date of purchase of the Shares, plus the applicable sales load, to a maximum of 5%.

DIVIDEND POLICY

The Corporation Code generally requires a Philippine corporation with surplus profits in excess of 100% of its paid-up capital to declare and distribute such surplus to its shareholders in the form of dividends. The Board of Directors of the Fund has adopted a policy, consistent with the Fund's objective of capital appreciation, to retain the surplus profits of the Fund in the retained earnings account. Such accumulation is reflected in the computation of the net asset value per share. Shareholders realize their gains when shares are redeemed. (Please refer to the discussion on Dividends under the section on "Description of Capital Stock" on page 21).

FUND MANAGER, PRINCIPAL DISTRIBUTOR, INVESTMENT ADVISOR AND TRANSFER AGENT

The Investment Manager (or "Fund Manager"), Principal Distributor, Investment Advisor and Transfer Agent of the Fund is BPI Investment Management, Inc. (or "BPI Investment"). As fund manager, BPI Investment shall formulate and implement the investment strategy, provide and render management, technical, and administrative services, whereby authorizing BPI Investment to purchase and sell investment securities for the account of the Fund. As investment advisor, it is tasked to render services which include investment research and advice; the preparation of economic, industry, market, corporate, and security analyses; and assistance and recommendations in the formulation of investment guidelines. As Transfer Agent, BIMI shall provide transfer agency services including the maintenance of the official stock and transfer book of the Fund, the issuance of shareholders' Transaction Advice, and payment of dividends, if any. For its services, BPI Investment shall charge a fee of not more than the rate stipulated below, based on the average daily trading NAV of the Fund.

Name of Fund	Management Fee	Distribution Fee	Transfer Agent Fee
ALFM Euro Bond Fund	0.1625% p.a.	0.1625% p.a.	0.050% p.a.

DISTRIBUTORS

The Fund's Shares shall be made available to the public primarily through the Fund's authorized distributors, BPI Capital Corporation, BPI Investment Management, Inc., and First Metro Securities Brokerage Corporation as well as other authorized and accredited distribution firms. The foregoing companies were licensed by the Securities and Exchange Commission to distribute mutual fund securities to the public. The distribution fee payable to the distributor shall be based on the outstanding daily balance of the Fund's shares distributed, as follows, and shall be taken from the 0.375% p.a. total fee:

Sub-Distributor	Distribution Fee
BPI Capital Corporation	0.1875% p.a.
First Metro Securities Brokerage Corporation	0.1875% p.a.

With the recent issuance of BSP Circular 844 (Cross-selling of Collective Investment Schemes and Other Amendments to Circular No. 801 on Revised Cross-selling Framework) on August 11, 2014, specifically trained and qualified bank employees are allowed to market/sell mutual funds under a cross-selling arrangement. ALFM Euro may also enter into such cross-selling arrangements with select banking institutions. This is subject to the requirement that such bank employees shall be required to secure the necessary license from SEC to be qualified to market/sell mutual funds to the public.

SALES LOADS

Sales Agents of the Fund's Distributors shall be entitled to collect a front-end Sales Load, based on each amount invested by an applicant or Shareholder in the Fund, in such percentages but not exceeding the rate stipulated below:

Name of Fund	Amount Invested	Maximum Sales Load
ALFM Euro Bond Fund	Any amount	5.0%

There are no other incidental charges incurred in purchasing the Fund's shares aside from the applicable sales load fees, if not waived, as stated in this prospectus.

CUSTODIAN BANK

As required under the Investment Company Act, a custodian bank, Citibank, N.A., has been appointed by the Fund for the purpose of holding relevant securities of the Fund, including (if applicable) subscription payments or proceeds from the sale of the Shares, until they can be invested in the appropriate securities consistent with the Funds' objectives. The custodian bank charges the following safekeeping fees which is billed monthly based on face/nominal value of the securities at month end for fixed income securities and based on the market value of the portfolio at month end for local equities:

Scripless Securities / Book Entry

Asset Size: USD 0 – USD 250 Mn	1.50 bps p.a.
Above USD 250 Mn to USD 750 Mn	1.25 bps p.a.
Above USD 750 Mn	1.00 bps p.a.

Physical Securities PhP 10,000 per month

Minimum Monthly Relationship Fee of USD 1,000 per month

The custodian bank also charges the following transaction fees per transaction.

<i>Scripless Securities</i>	Formatted Instructions	Unformatted/ Manual Instructions
0 – 1,000 transactions per month	PhP 50	PhP 300
Above 1,000 – 2,000 transactions per month	PhP 35	
Above 2,000 transactions per month	PhP 25	

RECEIVING BANK

The Bank of the Philippine Islands has been designated by the Fund as Receiving Bank where payments for Shares purchased may be made.

INDEPENDENT AUDITOR

Isla Lipana & Co. (formerly Joaquin Cunanan & Co.) has been appointed by the Fund as its External Auditor.

INFORMATION SUPPLIED BY THE FUND

Unless otherwise stated, the information contained in this document has been supplied by the Fund which accepts full responsibility for the accuracy of the information and confirm, having made all reasonable inquiries, that to the best of its knowledge and belief, there are no other material facts, the omission of which would make any statement in this document misleading in any material respect. Neither the delivery of this document nor any sale made hereunder shall, under any circumstances, create any implication that the information contained herein is correct as of any time subsequent to the date hereof.

No dealer, salesman or other person has been authorized by the Fund or by the Distributors to issue any advertisement or to give any information or make any representation in connection with the offering or sale of the Offer Shares other than those contained in this document and, if issued, given or made, such advertisement, information or representation must not be relied upon as having been authorized by the Fund or the Distributors.

This document does not constitute an offer or solicitation by any one in any jurisdiction in which such offer or solicitation is not authorized or to any person to whom it is unlawful to make any such offer or solicitation. Each investor in the securities offered hereby must comply with all applicable laws and regulations in force in the

jurisdiction in which it purchases, offers or sells such securities and must obtain the necessary consent, approval or permission for its purchase, offer or sale of such securities under the laws and regulations in force in any jurisdiction to which it is subject or in which it makes such purchase, offer or sale, and neither the Fund nor the Distributors shall have any responsibility thereof. Foreign investors interested in subscribing to the Offer Shares should inform themselves as to the applicable legal requirements under the laws and regulations of the countries of their nationality, residence or domicile and as to any relevant tax or foreign exchange control laws and regulations which may affect them.

This Prospectus sets forth concisely the information about the Fund that prospective investors will find helpful in making an investment decision. Investors are encouraged to read this Prospectus carefully and retain it for future reference. Additional information about the Fund has been filed with the Securities and Exchange Commission ("SEC") and is available upon request.

SUMMARY OF FINANCIAL INFORMATION

The following information was lifted from the Audited Financial Statements for the years ending December 31, 2018, December 31, 2017 and December 31, 2016. The latest financial reports audited by the Fund's external auditor, Isla Lipana & Co., as of December 31, 2018, appear at the end of this Prospectus. The information set out below should be read in conjunction with the financial statements and related notes that are found in this Prospectus.

ALFM EURO BOND FUND

As of December 31, 2018 (Audited)			
Balance Sheet		Income Statement	
Total Assets	EUR 11,611,961	(Loss) Income	EUR (36,879)
Total Liabilities	29,873	Expenses	60,142
		(Loss) Income Before Income Tax	(97,021)
		Income Tax (Benefit) Expense	(23,044)
Total Equity	11,582,088	Net (Loss) Income	(73,977)

Net Asset Value per Share as of December 31, 2018: EUR 212.67

As of December 31, 2017 (Audited)			
Balance Sheet		Income Statement	
Total Assets	EUR 11,457,392	Income	EUR 304,077
Total Liabilities	49,036	Expenses	67,349
		Income Before Income Tax	236,728
		Income Tax Expense	71,146
		Net Income	165,582
		Other Comprehensive Income	8,847
Total Equity	11,408,356	Total Comprehensive Income	174,429

Net Asset Value per Share as of December 31, 2017: EUR 213.72

As of December 31, 2016 (Audited)			
Balance Sheet		Income Statement	
Total Assets	EUR 10,918,022	Income	EUR 320,694
Total Liabilities	8,546	Expenses	97,984
		Income Before Income Tax	222,710
		Income Tax Expense	752
		Net Income	221,958
		Other Comprehensive Income	3,724
Total Equity	10,909,476	Total Comprehensive Income	225,682

Net Asset Value per Share as of December 31, 2016: EUR 209.58

RISK DISCLOSURE STATEMENT

GENERAL RISK WARNING

- The prices of the securities can and do fluctuate, and any individual security may experience upward or downward movements, and may even become valueless. There is an inherent risk that losses may be incurred rather than profit made as a result of buying and selling securities.
- Past performance is not a guide to future performance.
- There is an extra risk of losing money when securities are bought from smaller companies. There may be a big difference between the buying price and the selling price of these securities.
- An investor deals in a range of investments each of which may carry a different level of risk.

PRUDENCE REQUIRED

This risk warning does not purport to disclose all the risks and other significant aspects of investing in these securities. An investor should undertake his or her own research and study on the trading of securities before commencing any trading activity. The investor may request information on the securities and Issuer thereof from the Commission which are available to the public.

PROFESSIONAL ADVICE

An investor should seek professional advice if he or she is uncertain of, or has not understood any aspect of, the securities in which to invest or the nature of risks involved in trading securities, especially high risk securities.

RISK FACTORS AND RISK MONITORING AND MANAGEMENT

The NAVPS of the Fund may fluctuate due to various risk factors such as:

A. Factors External to the Fund, listed in the order of importance:

1) Market Risk

The risk that movement in the financial markets will adversely affect the value of investments of the Fund. To properly manage market risk, various risk measurement methodologies are utilized to quantify the potential change in portfolio value resulting from changes in security prices. Measures of risk-adjusted performance are also utilized. Market risk is controlled through the establishment of investment limits and by managing the fund according to investment guidelines and parameters that are consistent with its return objective and risk profile.

2) Interest Rate Risk

The risk that the value of the portfolio will decline as interest rates rise. Bond prices are inversely related to interest rates (ie. as interest rates increase, bond prices decrease). Interest rate risk is measured using duration and controlled through duration limits. To mitigate this risk, the Fund Manager closely monitor movements in interest rates.

3) Liquidity Risk

The risk that the investments of the Fund cannot be sold or converted into cash within a reasonable time or in instances where sale or conversion is possible but not at a fair price. A liquidity contingency plan, which provides a framework for addressing liquidity crisis situations is in place.

4) Credit Risk

The risk that the bond issuer may not be able to pay its debt when interest payments and maturity falls due. Credit risk is minimized through diversification. Investment and counterparty limits are also established and monitored regularly. All investment outlets and counterparties go through accreditation prior to the execution of investment transactions.

5) Inflation Risk

The risk that the return of your investments will not keep in pace with the increase in consumer prices. To mitigate inflation risk, the Fund Manager closely monitors inflation.

6) Reinvestment Risk

The risk associated with the possibility of having lower return when maturing securities or the interest earnings of funds are re-invested. To mitigate reinvestment risk, the Fund Manager closely monitors interest rate trends so as to re-invest at higher interest rates.

7) Foreign Exchange Risk

This is the possibility for an investor to experience losses from a decline in fund value when the market value of fixed income securities, settled in any other currency, held by the fund are converted/translated to Philippine Peso. To mitigate foreign exchange risk, the fund manager closely monitor the movements in the spot market.

B. Risks Inherent to the Fund, listed in the order of importance:

- 1) Investors in an open-end fund are exposed to the risk of dilution, since other investors are allowed to purchase shares and/or redeem their entire holdings any time. Given this inherent risk, the Fund Manager tries to lessen the frequency of withdrawals by imposing an early redemption fee for investors who redeem

from the Fund during the stipulated minimum holding period. By doing this, investors are discouraged to redeem during the minimum holding period, thereby allowing the Fund Manager to maximize the investments during the said period.

- 2) Unlike closed-end funds, the investment potential and capability of the Fund is limited by liquidity constraints as the Fund Manager should always ensure that there are sufficient liquid assets to service redemptions at any given time.
- 3) Unlike bank accounts, investment companies / mutual funds are neither insured with the PDIC nor any other agency of the government, nor guaranteed by the Fund Manager. Before investing in the Fund, investors are expected to understand that the Fund is not a bank deposit product and any income, or loss, shall be for the account of the investor. Investors are advised to read the Prospectus of the Fund, which may be obtained from authorized distributors, before deciding to invest. The Fund is registered with the Securities and Exchange Commission.
- 4) Mutual funds are subject to "manager risk," which is the potential for a fund to fail to achieve its objectives due to investment decisions by the Fund Manager, caused by the Fund Manager's ability, or failure, to "read the market" accurately. To mitigate this risk, the Fund Manager employs a thorough investment process, considering macroeconomic factors and integrating them in asset allocation models to optimize the return of the portfolio. The Fund Manager likewise keeps abreast of current market conditions through various trainings and seminars on fund management techniques as well as close coordination with various counterparties and regulators.

PRINCIPAL PARTIES TO THE OFFERS

Issuer	ALFM Euro Bond Fund, Inc. 19/F, BPI Buendia Center Sen. Gil J. Puyat Ave., Makati City
Fund Manager	BPI Investment Management, Inc. 19/F, BPI Buendia Center Sen. Gil J. Puyat Ave., Makati City
Distributors	BPI Investment Management, Inc. BPI Capital Corporation First Metro Securities Brokerage Corporation
Investment Advisor	BPI Investment Management, Inc. 19/F, BPI Buendia Center Sen. Gil J. Puyat Ave., Makati City
Receiving Bank	Bank of the Philippine Islands BPI Building, Ayala Avenue cor. Paseo de Roxas Makati City
Transfer Agent	BPI Investment Management, Inc. 19/F, BPI Buendia Center Sen. Gil J. Puyat Ave., Makati City
Custodian Bank	Citibank, N.A., Philippine Branch Citibank Tower, Citibank Plaza 8741 Paseo De Roxas Makati City
External Auditor	Isla Lipana & Co. Member firm of PricewaterhouseCoopers 29th Floor, Philamlife Tower Paseo de Roxas, Makati City

DEFINITION OF TERMS

ALFM Mutual Funds	ALFM Peso Bond Fund, Inc. ALFM Dollar Bond Fund, Inc. ALFM Euro Bond Fund, Inc. Philippine Stock Index Fund Corp. ALFM Growth Fund, Inc. ALFM Money Market Fund, Inc. ALFM Global Multi-Asset Income Fund, Inc.
BPI	Bank of the Philippine Islands
BPI Capital	BPI Capital Corporation
BPI Investment	BPI Investment Management, Inc.
BSP	Bangko Sentral ng Pilipinas
Certified Investment Solicitor (CISol)	An individual, employed by a Distributor, who shall have taken and passed the mutual fund sales agents' licensing examination given by the SEC
Corporation	ALFM Euro Bond Fund, Inc.
Corporation Code	The Corporation Code of the Philippines (<i>Batas Pambansa Blg. 68</i>)
CPI	Consumer Price Index
Credit Authority	The redemption slip or the Fund Order Form for the Fund's Shares, signed by a Shareholder, authorizing the Receiving Bank to credit the proceeds from the sale of said Shares into the Shareholder's Settlement Account
Customer Referral Sheet	The application for subscription to the Offer Shares in the form prescribed
Debit Authority	The Payment Slip or Fund Order Form for the Fund's Shares, signed by an applicant, authorizing the Receiving Bank to debit said applicant's Settlement Account for the full payment of the Shares applied for
Distributors	BPI Investment Management, Inc. BPI Capital Corporation First Metro Securities Brokerage Corporation
Early Redemption Fee	The redemption fee of 1.0% imposed on redemptions made by Shareholders during the minimum holding period, which accrues to the Fund
EUR	Euro, the lawful currency of the Eurozone
Fund	ALFM Euro Bond Fund, Inc.
Fund Manager	BPI Investment Management, Inc.
Investment Advisor	BPI Investment Management, Inc.
Investment Company Act	The Investment Company Act of 1960 (Republic Act No. 2629)

Minimum Holding Period The period during which a 1.0% early redemption fee is charged for redemptions made during the said period, as follows:

Name of Fund	Minimum Holding Period
ALFM Euro Bond Fund	180 days

NAV Net Asset Value, defined as the value of the assets of the Fund, less the value of the liabilities

NAV per Share NAV divided by the total number of Shares outstanding

Offer The Offer to the public for subscription to the maximum number of unclassified and voting common shares of the Fund at the Offer Price, as follows:

Name of Fund	Maximum Number of Shares
ALFM Euro Bond Fund	80,000

Offer Price The Fund's prevailing NAV per Share computed as of end-of-day on the date of purchase of the Shares, plus the applicable sales load, if any, to a maximum of 5%.

Offer Shares The unclassified and voting common shares of the Fund

Name of Fund	Maximum Number of Shares
ALFM Euro Bond Fund	80,000

Par Value The par value of the Shares, as shown below:

Name of Fund	Par Value (in PhP)
ALFM Euro Bond Fund	10,000.00

PAS Philippine Accounting Standards

PDEX Philippine Dealing and Exchange Corporation

Peso or PhP Philippine peso, the lawful currency of the Republic of the Philippines

PIFA Philippine Investment Funds Association

PSEi The Philippine Stock Exchange Composite Index

Redemption Price The Fund's prevailing NAV per Share computed as of end-of-day on the date of sale of the Shares, less the applicable Early Redemption Fee, if any

Registration Statement The registration statement filed by the Fund with the SEC in compliance with the Securities Regulation Code and the Investment Company Act

Regular Subscription Plan (RSP) The automated periodic purchase (i.e., monthly or quarterly) of the Fund's shares in a pre-determined fixed amount

Sales Load	The sales commission, to a percentage not exceeding 5.0%, if any, collected from the subscribers of the Shares and paid to the Distributors or their Certified Investment Solicitor (CISol)
SEC	The Securities and Exchange Commission of the Philippines
Securities Regulation Code	Republic Act No. 8799
Service Administrator	BPI Investment Management, Inc.
Servicing Agent	A Certified Investment Solicitor (CISol) of the Fund with whom a Shareholder shall transact purchases and redemptions of the Shares
Settlement Account	A BPI current account or savings account required to be opened and maintained by each person or entity transacting the Shares against which all payments for Shares purchased shall be debited and into which all proceeds of Shares sold shall be credited
Shareholder	An owner of shares in the ALFM Euro Bond Fund
Shares	The unclassified and voting common stock of the ALFM Euro Bond Fund, issued out of the Fund's authorized capital stock or, when the context requires, the Fund's outstanding capital stock including the Offer Shares
Transaction Advice	The evidence of ownership of a Shareholder's holdings in the Fund
Valuation Day	A trading day when the Fund is made available for buying or selling and on which date the Fund Manager shall determine the NAV of the Fund

TERMS AND CONDITIONS OF THE OFFER

Eligible Investors

The Shares of the Fund may be held by any person of legal age, or by a duly authorized and existing corporation, partnership or other entity regardless of nationality. However, because the Fund shall invest in shares of stock of Philippine corporations, Philippine law limits foreign ownership of the Fund to a maximum of forty percent (40%) of the Fund's issued and outstanding capital stock. The Fund, through the Stock Transfer Agent, has the right not to permit nor allow the issuance or transfer of shares of the Fund which would reduce the ownership by Philippine nationals of the Fund's outstanding capital stock to less than 60%.

Any applicant for subscription to the Offer Shares shall declare and warrant that he/she is of legal age or, in the case of a corporate applicant, that there are no legal restrictions prohibiting its acquisition of the Shares applied for and that such applicant is otherwise eligible to remain a Shareholder of the Fund throughout the duration of the period that he/she/it owns Shares of the Fund.

The Offer

The Fund is offering to the public its unclassified and voting common shares at the Offer Price. The Shares shall be made available for sale until the earlier of: (i) the date the Fund terminates the Offer, or (ii) the date when the number of Shares subscribed and paid for has reached the Authorized Capital Stock indicated below:

Name of Fund	Authorized Capital Stock
ALFM Euro Bond Fund	80,000

The Offer Price

The Shares shall be offered at an Offer Price based on the NAV per Share computed by the end-of-day of each valuation date, plus the applicable Sales Load (to a maximum percentage of 5%). Shares applied for after the Cut-off Time shall be offered at an Offer Price based on the NAV per share calculated as of the next valuation day.

Cut-off Time

1:30 p.m. of a valuation day

Minimum Subscription

A minimum subscription amount or worth of Shares shall be considered for each new application. The Fund, subject to the approval of its Board of Directors, may change such initial subscription amount and minimum additional subscription amount, including that of the Regular Subscription Plan (RSP). Securities sold shall be on cash basis. Installment sales are hereby expressly prohibited. In a Regular Subscription Plan, the investor purchases shares in a periodic frequency (i.e., monthly or quarterly) and at a fixed amount, the minimum of which is to the minimum additional subscriptions.

Name of Fund	Minimum Initial Subscription Amount	Minimum Additional Subscription (including for RSP)
ALFM Euro Bond Fund	EUR 500.00	EUR 100.00

Minimum Maintaining Balance

At any time, Shareholders should have holdings in the Fund worth at least:

Name of Fund	Minimum Maintaining Balance
ALFM Euro Bond Fund	EUR 500.00

Minimum Partial Redemption

Redemptions by Shareholders from the Fund should be worth at least:

Name of Fund	Minimum Partial Redemption
ALFM Euro Bond Fund	EUR 100.00

Should a partial redemption result in the investment falling below the required Minimum Maintaining Balance, the entire shareholdings of the Shareholder, multiplied by the applicable NAV per Share as of the date of the partial redemption, shall be paid to the said Shareholder via a credit to his Settlement Account, without need of prior notice to the Shareholder, unless the shareholder redeems before the Minimum Holding Period, there will be no redemption fee; otherwise, the Early Redemption Fee of 1% will be applied.

Payment for the Shares

Shares applied for shall be paid in full via a Debit Authority against the applicant's Settlement Account signed by the applicant on the date of application. The Purchase Order should be received before the Fund's cut-off time. Purchase orders received after the cut-off time shall be considered as orders for the next valuation day. The applicant's Settlement Account shall be earmarked in real-time for the subscription amount and the actual debit shall be done at end-of-day after the Offer Price for the day shall have been determined.

Registration of Investments

The registration of foreign investments in the Offer Shares with the proper Philippine Government authorities or authorized agents shall be the responsibility of the affected foreign investor.

COMPANY BACKGROUND

The ALFM Euro Bond Fund, Inc. (“ALFM Euro” or the “Fund”) was incorporated on August 5, 2005 as ALFM Euro Fund, Inc. with an authorized capitalization of PhP 200.0 Million consisting of 20,000 common shares of par value PhP10,000.00 per share. On September 6, 2005, the SEC approved the change in the Fund’s name from ALFM Euro Fund, Inc. to ALFM Euro Bond Fund, Inc. The following table provides information on the history of the Fund’s authorized capital stock increases:

Increase No.	Authorized Capital Stock	Date of SEC Approval
1	50,000 shares	October 13, 2006
2	80,000 shares	May 30, 2007

On February 8, 2006, the Board of Directors and Shareholders of the Fund approved the increase in Authorized Capital Stock of the Fund to EUR 1.0 Billion (or its equivalent in Pesos) consisting of 6,000,000 common shares of par value PhP10,000.00 per share, and to be implemented in tranches. The Authorized Capital Stock of the Fund currently stands at PhP 800.0 Million consisting of 80,000 common shares of par value PhP10,000.00 per share.

The Fund has entered into a Management and Distribution Contract with BPI Investment Management, Inc. authorizing BPI Investment to purchase and sell investment securities for the account of the Fund. The Fund does not have employees of its own since the management and administration functions are already being handled by BPI Investment. The Fund has adopted a Manual of Corporate Governance and an Anti-Money Laundering Operating Manual. Quarterly reporting of the Fund’s operations to the Board of Directors is being performed by BPI Investment to properly identify, assess and manage risks that may arise any time during the Fund’s daily operations. ALFM Euro does not own any property *such as* real estate, plant and equipment, mines, patents, etc. required to be disclosed under Annex C of SRC Rule 12.1.

ALFM Euro is categorized as a Euro-denominated bond fund. There are currently seventy (70) investment companies in the Philippines wherein ALFM Euro is the lone Euro-denominated fixed income mutual fund.

ALFM Euro, as an investment company, will be regularly dealing with the following principal parties, among others, as follows:

Fund Manager, Investment Advisor

and Transfer Agent:

Fund Distributors:

BPI Investment Management, Inc.

BPI Investment Management, Inc.

BPI Capital Corporation

First Metro Securities Brokerage Corporation

REGULATORY ENVIRONMENT

Investment companies are regulated by the Securities and Exchange Commission and are registered under the Investment Company Act of 1960 and the Securities Regulation Code (“SRC”) of 2000. Prior to the SRC, investment companies were registered under the Revised Securities Act. Any amendments to these or their implementing rules and other applicable laws may have effects on the operations of investment companies. Moving forward, market and regulatory developments such as the proposed Collective Investments Schemes Law and the Asian Region Fund Passporting, will further drive and shape the mutual fund landscape.

LEGAL PROCEEDINGS

The Fund, the Fund Manager, and their Directors and Officers, have not been involved in any material legal proceeding since the Fund’s incorporation.

DESCRIPTION OF CAPITAL STOCK

I. Capital Structure

The ALFM Euro Bond Fund's authorized capital stock is shown in the table below:

Name of Fund	Number of Authorized Shares	Par Value (in PhP)	Authorized Capital Stock (in PhP)
ALFM Euro Bond Fund	80,000	10,000.00	800,000,000

The Fund shall offer to the public common shares to be priced at the Net Asset Value per Share, determined at end-of-day of each valuation date, plus any applicable sales load.

II. Rights and Privileges

A. Voting Rights

The Fund shall issue only one (1) class of common shares. The Shares have identical rights and privileges, including voting rights. Each Share entitles the holder thereof to one vote at any meeting of Shareholders of the Fund. Shareholders shall have cumulative voting rights for the election of the Fund's directors.

B. Preemptive Rights

The Corporation Code confers preemptive rights to shareholders of a Philippine corporation and entitles them to subscribe to all issues or other dispositions of shares by the corporation in proportion to their respective shareholdings, regardless of whether the shares proposed to be issued or otherwise disposed of are identical in all respects to the shares held. However, a Philippine corporation may provide for the exclusion of these preemptive rights in its Articles of Incorporation and By-Laws.

The Fund's Articles of Incorporation deny preemptive rights to the Shareholders. Therefore, Shareholders of the Fund **do not have** the preemptive right to subscribe to any new issue of shares nor the right to purchase any disposition by the Fund of any of its treasury shares. Furthermore, no Shareholder shall have a preemptive nor other right to purchase, subscribe for, or take any part of any stock or any other securities convertible into, or carrying options or warrants to purchase, shares of the Fund. Any part of such stock or other securities may at any time be issued, optioned for sale, and sold or disposed of by the Fund pursuant to the resolution of its Board of Directors, to such persons and upon such terms as may, to such Board, seem proper, without first offering such stock or securities or any part thereof to existing Shareholders.

C. Appraisal Right

Under the Corporation Code, Shareholders who dissent from certain corporate actions (including the merger or sale of all or substantially all of the assets of the Fund) may demand payment of the fair market value (net asset value) of their Shares in certain circumstances. The fair value at which the shares of a dissenting shareholder may be sold to the corporation may be agreed upon by the parties. If they cannot reach agreement, it shall be determined by an independent committee. Payment of the shares of a dissenting shareholder may be made only if the corporation has unrestricted retained earnings to purchase the shares.

Rights of the Shareholders in case of Dissolution of the Investment Company and the Dissolution Plan

The Fund may be dissolved by a majority vote of the Board of Directors and by a resolution duly adopted by the affirmative vote of the investors owning at least two-thirds (2/3) of the outstanding capital stock of the Fund. Investors shall continue to possess all existing rights as shareholders of the Fund.

The Fund will liquidate its assets within six (6) months from receipt of the Order revoking the registration statement of the Fund. During such time, the Fund will no longer accept additional subscriptions and will only allow redemptions of shares based on the prevailing NAVPS. The daily NAVPS of the Fund will continuously be computed and published, as long as practicable.

Other than the foregoing, there are no other material rights for common shareholders of the Fund.

III. Dividends

The Corporation Code generally requires a Philippine corporation with surplus profits in excess of 100% of its paid-up capital to declare and distribute such surplus to its shareholders in the form of dividends. Notwithstanding this general requirement, a Philippine corporation may retain all or any portion of such surplus when (i) justified by definite expansion plans approved by its Board of Directors; (ii) the required consent of any financing institution or creditor to such distribution is not forthcoming; or (iii) it can be clearly shown that such retention is necessary under special circumstances.

The Board of Directors of the Fund has adopted a policy, consistent with the Fund's objective of capital appreciation, to retain the surplus profits of the Fund in the retained earnings account. Such accumulation is reflected in the computation of the net asset value per share. Shareholders realize their gains when shares are redeemed. To date, there have been no distributions of dividends to shareholders. The Board of Directors of the Fund may amend the dividend policy as conditions warrant. In said event, the declaration of cash dividends is subject to the restriction that no dividends will be declared that will impair the capital stock of the company.

IV. Other Provisions

There are also no provisions in the Articles of Incorporation or By-Laws that would delay, deter or prevent a change in control of the Fund.

MARKET FOR THE FUND'S COMMON EQUITY AND RELATED SHAREHOLDERS' MATTERS

Principal Market

The Shares of the ALFM Euro Bond Fund are available for purchase primarily by resident citizens or investors of legal age, or by duly authorized and existing corporations, partnerships or other entities, subject to existing Philippine laws, through Certified Investment Solicitor (CISol) of the Fund's Distributors. Investors who want to further diversify their foreign currency denominated investments with a medium-term to long-term investment horizon, are the primary target market of the Fund. The Shares of the Fund are not traded publicly on an exchange since the Fund stands ready to redeem or buy back the Shares from the Shareholders any time.

Shares of the Fund may be purchased from the Distributors or their Sales Agents at an Offer Price based on the Fund's NAV per Share any time before Cut-Off, plus the applicable sales load, if any. Shares applied for after the Cut-off Time shall be considered as applied for on the next valuation day.

Stated below are the NAV per Share of the Fund at the end of the quarters from 2007 to 2019.

ALFM Euro Bond Fund (EUR)	2014	2013	2012	2011	2010	2009	2008	2007
Quarter ending March 31	199.40	196.34	183.80	175.93	173.86	162.49	160.92	159.32
Quarter ending June 30	202.11	196.04	186.38	176.42	175.88	164.84	160.50	159.75
Quarter ending September 30	204.24	196.31	191.40	177.32	178.84	168.92	161.21	159.48
Quarter ending December 31	206.04	196.62	195.19	179.24	178.83	170.65	160.41	160.29

ALFM Euro Bond Fund (EUR)	2019	2018	2017	2016	2015
Quarter ending March 31	216.07	212.69	209.94	206.84	208.05
Quarter ending June 30	-	212.73	211.30	208.32	205.08
Quarter ending September 30	-	213.25	212.20	212.26	204.42
Quarter ending December 31	-	212.67	213.72	209.58	206.13

Stated below are the High and Low Net Asset Value Per Share (NAVPS) for the indicated quarters:

		2014	2013	2012	2011	2010	2009
Jan-Mar	high	3/28/2014 199.48	3/31/13 196.34	3/31/12 183.80	01/06/11 179.28	03/31/10 173.86	03/31/09 162.51
	low	1/2/2014 196.51	2/1/13 194.59	1/3/12 178.91	3/30/11 175.85	01/04/10 170.55	01/09/09 160.41

Apr-Jun	high	6/27/2014	202.23	5/19/13	197.40	6/3/12	186.63	6/28/11	176.91	4/6/10	173.95	06/03/09	165.23
	low	4/3/2014	199.16	6/26/13	195.95	4/1/12	183.81	4/20/11	175.19	6/29/10	175.86	04/03/09	162.45
Jul-Sep	high	9/26/2014	204.31	7/21/13	196.42	9/30/12	191.40	9/11/11	179.42	8/24/10	179.17	09/30/09	168.94
	low	7/4/2014	202.03	8/20/13	192.61	7/1/12	186.40	7/1/11	176.42	7/2/10	175.74	07/01/09	164.84
Oct-Dec	high	12/31/2014	206.04	11/12/13	197.37	12/31/12	195.19	12/31/11	179.24	11/9/10	179.68	12/28/09	170.55
	low	10/10/2014	204.34	10/4/13	196.02	10/1/12	191.37	10/10/11	176.79	12/20/10	178.28	10/05/09	168.90

		2019		2018		2017		2016		2015	
Jan-Mar	high	03/28/19	216.10	01/09/18	214.08	2/27/17	210.65	3/30/16	206.95	3/19/15	208.16
	low	01/09/19	212.27	03/21/18 and 03/22/18	212.39	2/2/17	208.18	1/20/16 and 2/15/16	205.71	1/9/15 and 1/14/15	206.08
Apr-Jun	high	-	-	04/18/18	213.34	6/27/17	211.95	6/30/16	208.32	4/16/15 and 4/21/15	208.48
	low	-	-	06/01/18 and 06/11/18	212.51	4/3/17	210.09	5/3/16	206.70	6/26/15	205.06
Jul-Sep	high	-	-	08/10/18	213.88	9/6/17	212.76	9/28/16	212.44	8/12/15	205.88
	low	-	-	07/05/18	212.80	7/7/17	211.11	7/1/16	208.39	9/30/15	204.42
Oct-Dec	high	-	-	10/02/18	213.37	12/12/17 and 12/14/17	214.17	10/3/16 and 10/24/16	212.11	12/3/15	206.59
	low	-	-	12/11/18	212.22	10/2/17	212.24	12/16/16	208.66	10/1/15	204.51

Number of Shareholders

The table below shows the Fund's total number of shareholders as of April 30, 2019:

Name of Fund	Number of Shareholders
ALFM Euro Bond Fund	603

Share Options and Treasury Shares

None of the Shares of the Fund are covered by options.

Issue of Shares

The Fund may issue additional Shares to any person, subject to the restrictions as may be stated in their Articles of Incorporation and/or By-Laws, and for a consideration based on Net Asset Value per Share.

Stock Certificates

In the interest of economy and convenience, definitive stock certificates representing the Fund's Shares shall not be issued unless requested by a Shareholder in writing addressed directly to the Fund through the Fund's Sales Agents. In lieu of stock certificates, the Fund shall issue Transaction Advice to Shareholders.

In case a stock certificate is issued, such certificate shall be returned to the Fund in the event of full or partial redemption by the holder thereof. The stock certificate shall be cancelled and no new certificate shall be issued until the cancelled certificate shall have been returned to its original place in the stock certificate transfer book. The necessary expenses for each certificate of stock issued or transferred shall be borne by the Shareholder who requested such issuance or transfer.

Share Register

The Fund's official share register shall be maintained by the Corporate Secretary, through the Fund's Service Administrator, who shall likewise be principally responsible for the maintenance of the official stock and

transfer book of the Funds in coordination with the Stock Transfer Agent who, in turn, shall be responsible for the issuance of stock certificates, as may be requested by Shareholders, and the payment of dividends, *if any*.

Recent Sales of Unregistered or Exempt Securities Including Recent Issuances of Securities Constituting an Exempt Transaction

Not applicable. The shares of the Fund are registered under the Investment Company Act (ICA) and the Securities Regulation Code (SRC).

DIRECTORS, OFFICERS, AND SIGNIFICANT SHAREHOLDERS

The following, who are all Filipino citizens, are the Fund's Directors and Officers as of the date of this Prospectus:

1. Romeo L. Bernardo, Chairman / Independent Director

Mr. Romeo L. Bernardo, Filipino, born in 1954, 64 years old, is the Chairman of the fund since 2005. He is also the Chairman of ALFM Peso Bond Fund, Inc. from 2003 to present, ALFM Growth Fund, Inc. from 2007 to present, ALFM Dollar Bond Fund, Inc. from 2003 to present, ALFM Money Market Fund, Inc. from 2009 to present, Philippine Stock Index Fund, Corp. from 2007 to present, and ALFM Global Multi-Asset Income Fund, Inc. from 2018 to present. He is currently the Managing Director of Lazaro Bernardo Tiu & Associates, Inc. and GlobalSource economist in the Philippines. Mr. Bernardo is likewise a director of several companies and organizations including Aboitiz Power, BPI, Globe Telecom Inc., RFM Corporation, Philippine Investment Management, Inc. (PHINMA), BPI-Philam Life Assurance Corporation, National Reinsurance Corporation of the Philippines, Financial Executives Institute of the Philippines (FINEX) Foundation. Mr. Bernardo was an Alternate Executive director of the Asian Development Bank from 1997 to 1998 and Undersecretary for International Finance, Privatization & Treasury Operations of the Department of Finance of the Republic of the Philippines from 1990 to 1996. Mr. Bernardo received a Bachelor of Science degree in Business Economics (magna cum laude) from the University of the Philippines and a Masters in Development Economics degree from Williams College in Williamstown, Massachusetts.

2. Simon R. Paterno, Vice Chairperson / Regular Director

Mr. Simon R. Paterno, Filipino, born in 1959, 60 years old, Filipino, heads the Financial Products and Alternative Channels Group of the Bank of the Philippine Islands. He is responsible for managing the product businesses of the Bank, including Investment Banking, Corporate Loans, Transaction Banking, Retail Lending, Cards and Payments, Asset Management and Trust, Electronic Channels, and Deposits. He also oversees subsidiaries and affiliates in insurance, leasing, and merchant acquiring. He is a member of the Management Committee of BPI. Mr. Paterno is the former President and CEO of the Development Bank of the Philippines, serving from 2002-2004. He worked for 18 years at the New York, Hong Kong, and Manila offices of J.P. Morgan, serving finally as Managing Director in charge of sovereign clients during the Asian Financial Crisis of 1997-98, and as Country Manager for the Philippines until 2002. He also worked for 8 years at Credit Suisse as Managing Director and Country Manager for the Philippines. Mr. Paterno obtained his MBA from Stanford University in 1984. He was awarded his A.B., cum laude, Honors Program in Economics from Ateneo de Manila University in 1980. In 2005, he was elected President of the Management Association of the Philippines. He serves on the boards of the Foundation for Economic Freedom and Ateneo Scholarship Foundation. He was named a TOYM awardee for Investment Banking in 1999.

3. Sherisa P. Nuesa, President / Regular Director

Sherisa P. Nuesa, Filipino, born in 1954, 64 years old, is a former Managing Director of conglomerate Ayala Corporation until her retirement in 2011. Currently, she is a member of the Boards of Directors/Trustees of: Manila Water Company, the ALFM Mutual Funds, Far Eastern University, Inc., the Generika group of companies, FERN Realty Corp. and East Asia Computer Center. She also serves as a Board Trustee of The Institute of Corporate Directors (ICD), Judicial Reform Initiative and Financial Executives Institute of the Phils (FINEX). She is also a Senior Board Adviser of Metro Retail Stores Group Inc. (MRSGI) and Board Adviser/Consultant of VICSAL Development Corporation. As a Managing Director of Ayala Corp., she served in various senior management positions: 1) Chief Finance Officer and Chief Administrative Officer, Integrated Micro-Electronics, Inc. - IMI (January 2009 to July 2010); 2) Chief Finance Officer, Manila Water Company Inc. - MWC (January 2000 to December 2008); 3) Group Controller and later Vice President for Commercial Centers, Ayala Land, Inc. - ALI (January 1989 to March 1999); and 4) member of the boards of various subsidiaries of ALI, MWC and IMI. Ms. Nuesa attended the Advanced Management Program of the Harvard Business School in the US in June 1999 and completed her Master in Business Administration (MBA) degree from the Ateneo-Regis Graduate School of Business in 2011. She also attended the Financial Management Program of the Stanford University in 1991 and Audit Committee Seminar for Directors at Harvard Business School in 2016. A Certified Public Accountant, she holds a BS in Commerce degree (Summa cum Laude, 1974) from the Far Eastern University. She is the ING-FINEX CFO of the Year awardee for the year 2008.

4. John Philip S. Orbeta, Independent Director

Mr. John Philip S. Orbeta, Filipino, born in 1961, 58 years old, is currently the Managing Director, Chief Human Resources Officer and Group Head for Corporate Resources at Ayala Corporation, covering Strategic Human Resources, Information & Communications Technology, AC Synergy, Knowledge Management, and Corporate Support Services. He has served as a member of the Ayala Corporation Management Committee since May 2005 and the Ayala Group Management Committee since April 2009. He is currently the Chairman of Ayala Aviation Corporation, Ayala Group HR Council, Ayala Group Corporate Security Council and Ayala Business Clubs; Chairman and President of HCX Technology Partners, Inc.; and Vice Chairman of Ayala Group Club, Inc. Mr. Orbeta also serves as a Board Director of AG Counselors Corporation, AC Industrial Technology Holdings, Inc., Ayala Foundation Inc., Ayala Healthcare Holdings, Inc., Ayala Retirement Fund Holdings, Inc., ZapFam Inc., BPI Family Bank, Inc., ALFM Growth Fund, Inc., ALFM Money Market Fund, Inc., ALFM Peso Bond Fund, Inc., ALFM Dollar Bond Fund, Inc., ALFM Global Multi-Asset Income Fund, Inc. and the Philippine Stock Index Fund Corp. Mr. Orbeta previously served as the President and CEO of Ayala Automotive Holdings Corporation and Automobile Central Enterprise, Inc. (Philippine importer of Volkswagen) and the Chairman and CEO of Honda Cars Makati, Inc., Isuzu Automotive Dealership, Inc. and Iconic Dealership, Inc., and Board Director of Honda Cars Cebu, Inc and Isuzu Cebu Inc. Prior to joining Ayala Corporation, he was the Vice President and Global Practice Director of the Human Capital Consulting Group at Watson Wyatt Worldwide (now Willis Towers Watson), overseeing the firm's practices in executive compensation, strategic rewards, data services and organization effectiveness around the world. He was also a member of Watson Wyatt's Board of Directors. He graduated with a degree in A.B. Economics from the Ateneo de Manila University in 1982.

5. Adelbert A. Legasto, Regular Director

Mr. Adelbert A. Legasto, Filipino, born in 1947, 71 years old, is also a director of ALFM Peso Bond Fund, Inc., ALFM Dollar Bond Fund, Inc., ALFM Money Market Fund, Inc., ALFM Growth Fund, Inc., the Philippine Stock Index Fund, Corp., ALFM Global Multi-Asset Income Fund, Inc., and BPI Investment Management, Inc.. He has served as Governor of the Philippine Stock Exchange 1994-96, Governor of the Makati Stock Exchange 1994-97, was an incorporator of the Philippine Central Depository (PCD), and served as President of the Trust Officers Association of the Philippines in 1998-99. He graduated from the Ateneo de Manila University with an A.B. Economics degree and completed his M.B.A. academics at the Ateneo Graduate School of Business. He completed the Pension Funds and Money Management from the Wharton School of the University of Pennsylvania, and Investment Management at the CFA Institute at the Harvard Business School in Boston, Massachusetts.

Other Officers of the Fund

1. Fernando J. Sison III – Treasurer

Mr. Fernando J. Sison III, Filipino, born in 1952, 67 years old, is the Treasurer of the Fund since inception in 2005. He used to be the President of BPI Investment Management, Inc. from May 2004 up to June 2012. He previously served as Vice President and head of many of BPI's divisions, including AMTG Retail Trust Division, AMTG Portfolio Management Division, SDG Retail Funds Distribution, and Private Banking Unit. He was assigned to BPI International Finance Ltd. (HK) as Head of Investment Management Division and to BPI Capital Corporation – Corporate Finance Group as Vice President and Head of Syndications and Underwriting. He completed the corporate finance module of JP Morgan in New York and underwent on-the-job training in corporate finance with JP Morgan in Hong Kong. He previously served as President of the Investment Company Association of the Philippines (ICAP) for 3 terms up to 2006 and as Chairman of the Board of the Philippine Investment Funds Association (PIFA), formerly ICAP, for 5 terms up to 2012-2013. He served as Industry Governor of the Market Governance Board of the Philippine Dealing and Exchange Corp. in 2008 and 2011 and as Alternate Governor for 5 terms. He is a SEC-licensed Certified Investment Solicitor from 2001 to 2012. He is currently the Investments Administrator and the Director for Business Affairs of the Ateneo de Manila University. He is a member of the Retirement Commission and the Investment Committee of the CEAP Retirement Fund. He is also a member of the Board of Senior Advisers of PIFA. Mr. Sison graduated from the Ateneo de Manila University in 1974 with the degree A.B. General Studies (Honorable Mention). He obtained his M.B.A. degree in 1976 from the University of the Philippines (Diliman).

2. Atty. Sabino B. Padilla IV, Corporate Secretary and Compliance Officer

Atty. Sabino B. Padilla IV, born in 1960, 58 years old, is the Corporate Secretary and Compliance Officer of the ALFM Mutual Funds. Atty. Padilla graduated with a degree in Bachelor of Laws from the University of the Philippines in 1985. He then received his Master of Laws from the Harvard University, USA in 1988. He is currently a partner of the Padilla Law Office which is legal counsel to BPI and its subsidiaries and to various religious orders, societies and congregations for men and women as well as educational institutions and hospitals operated by them. He is also the Corporate Secretary and Compliance Officer of other mutual funds such as the Solidaritas Fund and Ekklesia Mutual Fund.

3. Atty. Francis Lorenz E. Espiritu, Chief Data Protection Officer and Chief Risk Officer

Atty. Francis Lorenz E. Espiritu, born in 1987, 32 years old, is the Chief Data Protection Officer and Chief Risk Officer of the Fund. Atty. Espiritu graduated with a Juris Doctor degree from the Ateneo Law School in 2011 and became a member of the Philippine Bar in 2012. He is currently the Risk Management and Compliance Officer of BPI Investment Management, Inc., which is the Fund Manager, Principal Distributor and Investment Advisor of the ALFM Mutual Funds.

Significant employees

The ALFM Euro Bond Fund does not have employees of its own since the management, distribution, and administration of the Fund is already being handled by BPI Investment Management, Inc. The Fund does not have a parent company.

Additional Information Required under Annex C of SRC Rule 12.1:

- ☐ The incorporators of the Fund are:

Mr. Romeo L. Bernardo, Mr. Adelbert A. Legasto, Mr. Isagani G. de Castro, Mr. Ramon G. Madrid, and Mr. Emilio S. de Quiros, Jr.

- ☐ Each Director shall serve for a term of one (1) year from his appointment and until his successor has been duly elected and qualified, provided, however, that any Director may be removed from office at any time with or without cause by a 3/4 vote of the subscribed capital stock entitled to vote. Other than this, the Fund has no existing employment contract with any of the Fund's Directors.
- ☐ Mr. Romeo L. Bernardo and Mr. John Philip S. Orbeta are the Independent Directors of the Fund. An independent director is a person not having any relationship or position in the Fund, or in parties related to the Fund, the holding of which would interfere with the exercise of independent judgment in carrying out the responsibilities of a director, in compliance with Section 38 of the Securities Regulation Code.

- ☐ Security Ownership of Management, as of April 30, 2019:

Title of Class	Name of Owner	Position	Amount and Nature of Ownership	Citizenship	Percent of Class
Common	Romeo L. Bernardo	Chairman/ Independent Director	50 (beneficial)	Filipino	0.0687%
Common	Sherisa P. Nuesa	Director/President	50 (beneficial)	Filipino	0.0687%
Common	Adelbert A. Legasto	Director	553 (record, beneficial)	Filipino	0.7603%
Common	Simon R. Paterno	Director	50 (beneficial)	Filipino	0.0687%
Common	John Philip S. Orbeta	Independent Director	50 (beneficial)	Filipino	0.0687%
Common	Fernando J. Sison III	Treasurer	64 (record)	Filipino	0.0880%
Common	Sabino Padilla IV	Corp. Secretary/ Compliance Officer	0	Filipino	0.0000%
Common	Atty. Francis Lorenz E. Espiritu	Chief Data Protection Officer/Chief Risk Officer	0	Filipino	0.0000%

- ☐ Each Director and Officer is compensated an amount for every Board meeting attended, as shown in the table below:

Director / Officer	Position	Year	Salary	Bonus	Other Salary
Romeo L. Bernardo	Chairman	2010	46,750.00	-	-
		2011	46,750.00	-	-
		2012	25,500.00	-	-
		2013	14,875.00	-	-
		2014	19,125.00	-	-
		2015	19,125.00	-	-
		2016	14,875.00	-	-
		2017	19,125.00	-	-
		2018	20,250.00	-	-
		2019 (estimated)	20,000.00	-	-
Simon R. Paterno	Director (Starting March 2015)	2010	-	-	-
		2011	-	-	-
		2012	-	-	-
		2013	-	-	-
		2014	-	-	-
		2015	-	-	-
		2016	-	-	-
		2017	-	-	-
		2018	-	-	-
		2019 (estimated)	-	-	-
Sherisa P. Nuesa	Director (Starting April 2012)	2010	-	-	-
		2011	-	-	-
		2012	0.00	-	-
		2013	21,250.00	-	-
		2014	19,125.00	-	-
		2015	14,875.00	-	-
		2016	14,875.00	-	-
		2017	19,125.00	-	-
		2018	20,250.00	-	-
		2019 (estimated)	20,000.00	-	-
John Philip S. Orbeta	Independent Director (Starting April 2012)	2010	-	-	-
		2011	-	-	-
		2012	4,250.00	-	-
		2013	14,875.00	-	-
		2014	12,750.00	-	-
		2015	17,000.00	-	-
		2016	12,750.00	-	-
		2017	21,250.00	-	-
		2018	17,000.00	-	-
		2019 (estimated)	20,000.00	-	-
Adelbert A. Legasto	Director (Until December 2012) (Starting June 2015)	2010	53,950.00	-	-
		2011	46,750.00	-	-
		2012	25,500.00	-	-
		2013	-	-	-
		2014	-	-	-
		2015	8,500.00	-	-
		2016	14,875.00	-	-
		2017	19,125.00	-	-
		2018	22,500.00	-	-
		2019 (estimated)	20,000.00	-	-
Atty. Sabino B. Padilla IV	Corporate Secretary and Compliance Officer	2010	46,750.00	-	-
		2011	46,750.00	-	-
		2012	25,500.00	-	-

		2013	19,125.00	-	-
		2014	21,250.00	-	-
		2015	21,250.00	-	-
		2016	17,000.00	-	-
		2017	19,125.00	-	-
		2018	22,500.00	-	-
		2019 (estimated)	20,000.00	-	-
Fernando J. Sison III	Treasurer	2010	-	-	-
		2011	-	-	-
		2012	4,250.00	-	-
		2013	23,375.00	-	-
		2014	21,250.00	-	-
		2015	6,375.00	-	-
		2016	17,000.00	-	-
		2017	17,000.00	-	-
		2018	22,500.00	-	-
		2019 (estimated)	20,000.00	-	-
Atty. Francis Lorenz E. Espiritu	Chief Data Protection Officer and Chief Risk Officer	2017	-	-	-
		2018	-	-	-
		2019 (estimated)	-	-	-

- ❑ There are no other standard or consulting arrangements or any compensatory plan relating to resignation / retirement by which Directors and Officers are to be compensated other than that previously stated.
- ❑ No current Director of the ALFM Euro Bond Fund, or employees of the Fund Manager, or Investment Advisor, or any of the Distributors, is related to each other up to the fourth civil degree either by consanguinity or affinity. No Director of the ALFM Euro Bond Fund has been the subject of any legal or criminal proceedings during the past five (5) years.

Corporate Governance

The Fund has adopted a Manual of Corporate Governance to institutionalize the principles of good corporate governance in the entire organization. To measure or determine the level of compliance of the Board of Directors and Officers with the Fund's Manual of Corporate Governance, the Fund shall establish a review or evaluation system and shall submit the required Certification on the Fund's Compliance with the Manual of Corporate Governance. The company continuously evaluates the level of compliance of the Board of Directors and top level management with its Manual on Corporate Governance through a self-rating and peer evaluation system complemented by 180 degrees feedback mechanism. There has been no deviation from the Fund's Manual of Corporate Governance as of the date of this Prospectus. Other measures being undertaken by the Fund to fully comply with the adopted leading practices on good corporate governance are: (i) strict compliance on the appointment of Independent Directors; (ii) separation of the functions of the Chairman and the President; and (iii) the creation of an Audit Committee chaired by an Independent Director.

Anti-Money Laundering, FATCA and Counter-Terrorist Financing Policies

The Fund has adopted BPI Investment's Money Laundering and Terrorist Financing Prevention Program (MLPP). BPI Investment's MLPP is based on Republic Act No. 9160 or the "Anti-Money Laundering Act of 2011", as amended, and the Securities and Exchange Commission's ("SEC") Memorandum Circular No. 2 Series of 2010 on the Revised Guidelines in the Preparation of the Anti-Money Laundering Operating Manual for SEC Covered Institutions.

Investors of the Fund, including their beneficial owners, are required to undergo Customer Due Diligence (CDD), also known as Know-Your-Customer (KYC) for identity verification. In case of corporate and juridical entities, the legal existence and organizational structure, as well as the authority and identification of all persons purporting to act on their behalf, shall also be verified.

Investor transactions may be reported to the Anti-Money Laundering Council (AMLC) if they fall under the parameters provided by law or the MLPP.

The Fund has also adopted BPI Investment's policy on the Foreign Account Tax Compliance Act. Based on the information provided by the investor, BPI Investment will determine the FATCA status of the investor. The name, address, and U.S. TIN of identified U.S. Persons will be reported to the Bureau of Internal Revenue (BIR) or Internal Revenue Service (IRS) of the United States, as the case may be, including all other information required under the relevant FATCA regulations.

Procedures to Ensure Compliance with Relevant Laws and Regulation

To ensure the Fund's compliance with relevant laws and regulation, the Fund has appointed a Compliance Officer while the Fund Manager has its own Compliance Officer. The Compliance Officer is tasked to monitor and assess the overall implementation of the Compliance Program.

The Fund Manager's Compliance Program is designed to: (1) identify relevant laws and regulations affecting the Fund and the corresponding effects of non-compliance; (2) conduct periodic compliance testing and subsequent reporting of findings or exceptions noted to appropriate levels of management; and (3) provide for annual specific action plan or activities aimed at developing and maintaining a strong compliance culture and discipline within the entire organization.

The Compliance Officer, in coordination with management or the Board of Directors, shall take the initiative to update the Compliance Program to ensure compliance with new laws and regulations that are enacted or issued and to formulate new control processes in response to regulatory changes. To this end, the Fund Manager shall develop and maintain a constructive working relationship with various regulatory agencies through continuing dialogues and/or consultations geared towards a uniform understanding of laws and regulations, prompt resolution of issues and concerns.

Certain Relationships and Related Transactions

There were no transactions (or series of similar transactions) with or involving the company in which a director, executive officer, or stockholder owning ten percent (10%) or more of the Fund's total outstanding shares and members of their immediate family had or is to have a direct or indirect material interest.

Notwithstanding the above, Mr. Adelbert A. Legasto is a Director of the Fund and is also a Director of BPI Investment Management Inc. (BIMI). Mr. Simon R. Paterno is also an officer of the Bank of the Philippine Islands. Mr. Romeo L. Bernardo is an Independent Director of the Fund and an Independent Director of the Bank of the Philippine Islands.

Dealings with related parties such as deposit or investment products of BPI are done on an arm's length basis and in accordance with the best execution requirements set in the established internal guidelines.

BPI Investment Management, Inc (BIMI) was designated as fund manager and investment advisor of the Fund.

As fund manager, BIMI shall formulate and implement the investment strategy, provide and render management, technical, and administrative services, whereby authorizing BIMI to purchase and sell investment securities for the account of the Fund. As investment advisor, it is tasked to render services which include investment research and advice; the preparation of economic, industry, market, corporate, and security analyses; and assistance and recommendations in the formulation of investment guidelines. For its services, the Fund pays BIMI a fee of not more than 0.375% p.a. of the Fund's average daily trading NAV.

The Fund has distribution agreements with subsidiaries of BPI, namely, BIMI and BPI Capital Corporation (BPI Capital). Under the terms of the agreement, BIMI and BPI Capital are appointed as co-distributors to perform principally all related daily functions in connection with the marketing and the growth of the level of assets of the Fund. BPI acts as the receiving bank for the contributions and withdrawals related to the Fund as transacted by the distributors and shareholders.

Voting Trust Holders of More Than 5%

There is no existing voting trust or similar agreement entered into by Shareholders owning more than 5% of the Shares.

Legal Proceedings

The Fund is not party to any material pending legal proceedings.

Involvement in Certain Legal Proceedings

During the last five (5) years and material to evaluation, none of the Directors or Officers of the Fund were involved in any bankruptcy petition filed by or against any business of which any Director or Officer was a General Partner or Executive Officer either at the time of the bankruptcy or within two (2) years prior to that time; none were convicted by final judgment in a criminal proceeding, domestic or foreign, excluding traffic violations and other minor offenses; none were subject to any Order, judgment or decree not subsequently reversed, suspended or vacated, of any Court of competent jurisdiction, domestic or foreign, permanently or temporarily enjoining, barring, suspending or otherwise limiting their involvement in any type of business, securities, commodities, or banking activities; and none were found by a domestic or foreign Court of competent jurisdiction (in a civil action), the Commission or comparable foreign body, or a domestic or foreign Exchange or other organized trading market or a self-regulatory organization, to have violated a securities or commodities law or regulation and the judgment has not been reversed, suspended or vacated.

Changes in Control

There is no existing arrangement which is known to the Fund which may result in the change of control in the Fund.

External Audit Fees

Audit and Audit Fees

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

Isla Lipana & Co. is the appointed external auditor of the Fund's financial statements for the year then ending with the objective of expressing an opinion on them. The audit shall be made in accordance with the Philippine Standards on Auditing and accordingly includes such tests of the accounting records and such other auditing procedures as they would consider necessary. There are no other related services that the external auditor performed aside from the services mentioned above and no other fees billed related to tax services.

Management is responsible for the preparation and the fair presentation of these financial statements in accordance with Philippine Financial Reporting Standards. This responsibility includes: designing, implementing and maintaining internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatements, whether due to fraud or error; selecting and applying appropriate accounting policies; and making accounting estimates that are reasonable in the circumstances.

Audit fees paid for the financial statements for the years 2017 and 2016:

	2017	2016
Audit fees	PhP 37,878.40	PhP 19,840.91

Audit Policies

The Audit Committee approves any engagement for the services of the external auditor. The final draft of the Audited Financial Statement is presented to the Audit Committee, before the Board's final approval and confirmation.

Changes in and Disagreements with Account on Accounting and Financial Disclosure

Ms. Blesida A. Pestaño was the signing partner for the external auditor from fiscal year 2009 to 2013. For the Fund's Financial Statements as of December 31, 2014, December 31, 2015, December 31, 2016, December 31, 2017, and December 31, 2018, the signing partner is Mr. John-John Patrick V. Lim. The corporation is compliant with SRC Rule 68, as amended Part 1(3)(b)(ix) re: 5-year rotation of external auditor. In taking this action, the members of the Board of Directors considered carefully Isla Lipana & Co.'s performance, its independence with respect to the services to be performed, and its general reputation for adherence to professional auditing standards.

In the recent fiscal year external audit done by Isla Lipana & Co., there were no material disagreements with regard to accounting procedures and financial disclosures.

PRINCIPAL PARTIES

THE FUND MANAGER

BPI Investment Management, Inc. (“BPI Investment”), a wholly-owned subsidiary of the Bank of the Philippine Islands, is the Fund’s Investment Manager. It is tasked to formulate and implement the investment strategy of the Fund, and to provide and render management, technical, and administrative services to the Fund. BPI Investment was incorporated as Ayala Investment Management, Inc. on July 30, 1974 to principally engage in the business of managing an investment company. On March 5, 1991, the SEC approved the change in corporate name to the present name. BPI Investment is licensed by the SEC to act as Investment Company Adviser of mutual funds.

The Fund Manager does not have any existing arrangement with the Fund for the right to designate or nominate the members of the Board of Directors.

BPI Investment is also the Principal Distributor, Service Administrator, Investment Advisor, and Transfer Agent of the Fund.

The members of the Board of Directors of BPI Investment as of the date of this Prospectus are as follows:

1. Mercedita S. Nollado, Chairman

Ms. Nollado, Filipino, born in 1941, 78 years old, is the Chairman of BPI Investment Management, Inc. She has also been a member of the Board of Directors of BPI since 1991. She is also the Chairman of the Bank’s Retirement & Pension and Trust Committees and a member of the Bank’s Executive and Corporate Governance Committees. Ms. Nollado is also a Director of the following BPI subsidiaries and affiliates: BPI Family Savings Bank, Inc. and BPI Capital Corporation. Ms. Nollado serves as Director of the following companies: Ayala Land Commercial REIT, Inc., Michigan Holdings, Inc., Anvaya Cove Beach and Nature Club, Inc., Ayala Automotive Holdings Corporation, Honda Cars Cebu, Inc., Honda Cars Makati, Inc., Isuzu Automotive Dealership, Inc., Isuzu Cebu, Inc., Prime Initiatives, Inc., and Xurpas, Inc. She is also a member of the Board of Trustees of Ayala Foundation, Inc. and BPI Foundation, Inc. as well as Vice-President of Sonoma Properties, Inc. She used to be a member of the Board of Directors of Ayala Corporation from 2004 until September 2010. She became a Director of D&L Industries, Inc. starting in 2016. Ms. Nollado graduated with the degree of Bachelor of Science in Business Administration major in Accounting from the University of the Philippines in 1960 and placed second at the Certified Public Accountant Licensure Board Examination administered in the same year. In 1965, she obtained her Bachelor of Laws degree also from the University of the Philippines where she also placed second at the Bar Examination held in the same year.

2. Roberto Martin S. Enrile, President

Mr. Enrile, Filipino, born in 1969, 50 years old, is the President of BPI Investment Management, Inc. He served as head of Equities department of BPI Asset Management and Trust Corporation. With over 20 years of experience, Mr. Enrile has been in the banking and trust industry particularly in the capital markets. Prior to joining BPI, he was the head of Investments at Security Bank AMG and was with the Research, Investment Banking and Asset Management of ATR Kim Eng, now Maybank-ATR. Mr. Enrile was a graduate of FW Olin Graduate School of Business at Babson College where he earned a degree in Finance, minor in Entrepreneurship. He is also an alumnus of the Ateneo de Manila University with a Bachelor’s Degree in Business Management.

3. Ma. Ysabel P. Sylanteng, Independent Director

Ms. Sylanteng, Filipino, born in 1951, 67 years old, was Executive Vice-President of the Bank of the Philippine Islands, and Head of the Card Banking Division and Customer Relationship Management Group from 2005 to 2012. She joined BPI in 1983 with the rank of Assistant Vice-President. Her past directorships include Santiago Land Development Corporation, First Far East Development Corporation, FEB Speed International, Inc., BPI Direct Savings Bank, Inc., Prudential Bank and Pilipinas Savings Bank. She currently serves as an independent director of BPI Family Savings Bank, Inc. She graduated with AB-BSC major in Accounting from the Assumption College in 1973 and obtained her MBA from the Stanford University in 1977. She is a Certified Public Accountant.

4. Jesus V. Razon, Jr., Independent Director

Mr. Razon, Filipino, born in 1946, 73 years old, served as Senior Vice President of BPI and Head of the Human Resources Group. He also served as Head of the Consumer Banking Group – Metro Manila Branches. He serves as an independent director of BPI Family Savings Bank, Inc. and BPI Direct BankKO Inc., A Savings Bank (formerly known as BPI Direct Savings Bank, Inc.). His past directorships include BPI Operations Management Corp.; BPI Paseo de Roxas Condominium Corp.; Ayala Life Assurance, Inc.; FGU Insurance Corp.; BPI Forex Corp.; and Premiere Development Bank. Mr. Razon graduated from the Ateneo de Manila University with an A.B. Economics degree and earned his Master in Management degree from the Asian Institute of Management.

5. Adelbert A. Legasto, Regular Director

Mr. Legasto, Filipino, born in 1947, 71 years old, is also a director of ALFM Money Market Fund, Inc., ALFM Peso Bond Fund, Inc., ALFM Dollar Bond Fund, Inc., ALFM Euro Bond Fund, Inc., ALFM Growth Fund, Inc., ALFM Global Multi-Asset Income Fund, Inc., and the Philippine Stock Index Fund, Corp. He has served as Governor of the Philippine Stock Exchange 1994-96, Governor of the Makati Stock Exchange 1994-97, was an incorporator of the Philippine Central Depository (PCD), and served as President of the Trust Officers Association of the Philippines in 1998-99. He graduated from the Ateneo de Manila University with an A.B. Economics degree and completed his M.B.A. academics at the Ateneo Graduate School of Business. He completed the Pension Funds and Money Management from the Wharton School of the University of Pennsylvania, and Investment Management at the CFA Institute at the Harvard Business School in Boston, Massachusetts.

LIABILITY OF BPI INVESTMENT

Nothing in this Prospectus shall be construed as a guaranty of return or income; nor does it entitle the INVESTOR/s to a fixed rate of return on the money invested by him/her in the FUND. BPI Investment shall not be liable for any loss or depreciation in the value of the FUND or in the value of INVESTOR's shareholdings unless attributable to BPI Investment's act of fraud, willful default, gross negligence or evident bad faith. It is understood that mutual funds are not bank deposit products, not guaranteed by BPI Investment, not covered by the Philippine Deposit Insurance Corporation, and that losses, if any, are for the sole account of the INVESTOR/s.

MANAGEMENT AND DISTRIBUTION CONTRACT

The Fund vests upon the Fund Manager the authority, without need of prior approval or prior notification to the Fund, to purchase and sell securities and otherwise make or dispose of investments for the account of the Fund, within the limits of the guidelines set by law, the regulations set by the SEC, and the investment policies of the Fund.

The Fund Manager is further authorized to take charge of the collection of dividends, interests or other payments due on all securities owned by the Fund and shall, on behalf of and for the benefit of the Fund, exercise any and all rights of the Fund appurtenant to such securities such as the exercise of any preemptive rights, redemption rights, options, and others. The Fund Manager shall use voting rights for quorum purposes only. Nonetheless, in the event of unusual circumstances, the Fund Manager may request the Fund in writing for permission to exercise voting rights for other specified purposes.

The Fund Manager shall also provide transfer agency services including the maintenance of the official stock and transfer book of the Fund, the issuance of shareholders' Transaction Advice, and payment of dividends, *if any*.

BPI Investment shall also act as the Fund's Investment Advisor and is tasked to render services which include investment research and advice; the preparation of economic, industry, market, corporate, and security analyses; and assistance and recommendations in the formulation of investment guidelines.

For its services, the Fund Manager is entitled to charge a management, distribution, advisory and transfer agent fee based on the average daily trading Net Asset Value of the Fund, in such rates as are stipulated on page 6 of this Prospectus.

PLAN OF DISTRIBUTION

There are no Shares designated to be sold to specified persons. There is no plan to apply for listing in any exchange the Shares of the registrants. Consequently, none of the registrant's Shares are to be allocated to an exchange and/or to its members.

The Distributors of the Fund are BPI Investment Management, Inc., BPI Capital Corporation, and First Metro Securities Brokerage Corporation. All are distributors licensed by the Securities and Exchange Commission. However, First Metro Securities Brokerage Corporation has not yet started its operation of distributing the Fund's securities to the public as of the date of this Prospectus. Shares of the fund will be sold through SEC Certified Investment Solicitor (CISol) or via online facility of a CISol licensed institution. Distributors, through their CISol/s, shall comply with the Suitability Rule.

Institutions who wish to distribute the Fund's shares shall enter into an agreement with the principal distributor and the Fund. The said agreement shall contain all commercial and operational terms in the distribution and processing of the Fund's shares. Prior to distributing the shares of the Fund, the appointed third-party distributor shall secure a mutual fund distribution license from the Securities and Exchange Commission and shall be renewed as per the requirement of the regulatory body. Shares distributed by a third-party distributor shall have the same right with the shares distributed by the principal distributor.

The Distributors shall be entitled to collect a Sales Load based on each amount invested by an applicant or Shareholder in the Fund, in such maximum percentages as are stipulated on page 6 of this Prospectus, and shall have the discretion to establish the sharing of such Sales Load that is entitled to be received by its Sales Agents.

THE CUSTODIAN BANK

Citibank, N.A. is the Fund's Custodian Bank. Under the Custodianship Agreement, Citibank, N.A. shall be responsible for the safekeeping of appropriate monies and securities of the Fund as Custodian. Citibank, N.A. shall be entitled to collect a fee which shall be negotiated between the Fund and Citibank, N.A.

THE RECEIVING BANK

The Bank of the Philippine Islands shall serve as the Fund's receiving bank (the "Receiving Bank"). Payments for Shares purchased by applicants or existing Shareholders shall be deposited by the Servicing Agents into the Fund's settlement account maintained with the Receiving Bank. The proceeds of Shares redeemed from Shareholders shall be debited from the Fund's settlement account maintained with the Receiving Bank. There is no compensation to the Receiving Bank.

OTHER INFORMATION REQUIRED

The Fund has no independent counsel or expert hired on a contingent basis.

HANDLING CUSTOMERS' COMPLAINT

For any concerns, investors can contact BPI Investment thru any of the following numbers: (02) 580-3565, (02) 580-3566, and (02) 580-3569. Investors may also send an e-mail at bpi_investment@bpi.com.ph.

The fund manager will acknowledge the receipt of the concern/complaints within three (3) business days and log the same to "Complaints Log". Clients will be informed on the resolution within fourteen (14) calendar days for simple issues/request and sixty (60) calendar days for complex issues/request.

In case of improper handling, investors may refer their concerns to the SEC at <http://imessagemo.sec.gov.ph/login.php>.

POLICIES ON CONFLICT OF INTEREST AND MANAGEMENT AND PROCEDURES IN MONITORING AND RESOLVING CONFLICTS OF INTEREST

The directors and officers of the Fund are expected to act in the best interest of the Fund in a manner characterized by transparency, accountability and fairness. Directors and officers of the Fund should conduct fair business transactions with the Fund, and ensure that his or her personal interest does not conflict with the interests of the Fund.

The basic principle to be observed is that a director or officer should not use his or her position to profit or gain some benefit or advantage for himself or herself and/or his or her related interests. A director or officer should avoid situations that may compromise his or her impartiality.

To avoid or minimize future conflict of interest situations, the Nomination Committee of the Fund shall consider the possibility for such occurrences when determining potential nominees for directorships of the Fund. The Board of Directors shall likewise consider the same standard when appointing officers of the Fund.

If an actual or potential conflict of interest may arise on the part of a director or officer, he or she should fully and immediately disclose it and should not participate in the decision-making process. A director or officer who has a continuing material conflict of interest should seriously consider resigning from his or her position.

MECHANICS OF THE FUND

The Fund's Shares shall be offered through the accredited Distributors of the Fund. The Distributors shall be entitled to collect a front-end Sales Load based on each amount invested by an applicant or Shareholder in the Fund, in such percentages as are stipulated on page 6 of this Prospectus. The Distributors shall have the discretion to establish the sharing of such Sales Load that their Sales Agents are entitled to receive.

PURCHASE OF SHARES

Each new applicant shall fill out, either electronically or manually, a Customer Referral Sheet and a Payment Slip or Fund Order Form which may be obtained from, or provided by, any authorized Distributor. Applicant shall also fill out a Client Suitability Assessment Form to determine the client's understanding of the risks related to investing. Applicants undertake to sign all documents and/or perform such acts as may be necessary to enable them to be registered as holders of the Shares applied for and under their respective accepted Applications. In addition, if the applicant is a corporation, partnership or trust, the Application must be accompanied by the following documents: (1) a notarized Board Resolution covering the authority to invest in the Fund and designating the authorized signatories; (2) a certified true copy of the SEC Certificate of Registration, the Articles of Incorporation or other constitutive documents, the By-Laws, and General Information Sheet. For subsequent applications by a Shareholder, only a Payment Slip or Fund Order Form need be signed.

The Payment Slip or Fund Order Form shall indicate the gross amount of investment. The number of Shares that an investor will be able to buy will be determined as and when the Fund's NAVPS shall have been computed and accordingly made available at the end of the day. The investor's Settlement Account will be automatically debited at the end of the day for the amount of whole shares purchased, including the Sales Load, to a percentage that will not exceed 5.0%, if any.

Subscription Orders received on or before 1:30 p.m. (the "Cut-off Time") on any valuation day will be processed at the NAVPS applicable on that day. Subscriptions Orders received after the Cut-off Time shall be deemed to have been received on the next valuation day and will be processed at the NAVPS applicable on that day.

REDEMPTION OF SHARES

The Fund agrees to purchase, and each Shareholder of the Fund shall be entitled to require the Fund to purchase, but not in the event and to the extent that the Fund has no assets legally available for such purpose whether arising out of capital, paid-in surplus or other surplus, net profits or otherwise, all or any part of the Shares standing in the name of such Shareholder in the books of the Fund, but only at the Redemption Price as of the valuation day on which a Redemption Order is made.

The applicable NAVPS, less the Redemption Fee, *if any*, shall be called the "Redemption Price." Any such request for redemption shall be evidenced by a duly-signed Redemption Slip or Fund Order Form, submitted to the Fund through the Distributor's Sales Agent or Receiving Bank. Redemption Orders received on or before 1:30 p.m. (the "Cut-off Time") on any valuation day will be processed at the Redemption Price applicable on that day. Redemption Orders received after the Cut-off Time shall be deemed to have been received on the next valuation day and will be processed at the Redemption Price applicable on that day. The payment for Shares so redeemed shall be credited to the Shareholder's Settlement Account with the Receiving Bank within the period stipulated by existing SEC rules, currently set at no longer than seven (7) days reckoned from the date the Redemption Order is received by the Fund. The Fund shall be entitled to collect an Early Redemption Fee based on the amount redeemed, in accordance with the following schedule:

Name of Fund	Holding Period	Early Redemption Fee
ALFM Euro Bond Fund	180 days or less	1.00% flat
	more than 180 days	none

The Fund may suspend redemptions or postpone the date of payment for redemptions in cases when (i) normal trading is suspended on the Philippine Stock Exchange, or (ii) the BSP suspends clearing operations for the day, or (iii) with the consent of the SEC. The SEC may, whenever necessary or appropriate in the interest of the Fund's Shareholders, suspend the redemption of securities of open-end companies.

SPECIAL CONSIDERATIONS

The Fund shall not suspend the right of redemption nor not postpone the date of payment or satisfaction upon redemption of any redeemable security for more than seven (7) banking days after the tender of such security to the Fund, except in the following cases:

- (1) for any period during which banks are closed other than customary weekend and holiday closings;
- (2) for any period during which an emergency exists as a result of which (a) disposal by the Funds of securities owned by them are not reasonably practicable, or (b) it is not reasonably practicable for the Fund to determine the value of its net assets; or
- (3) for such other periods as the SEC may, by order, permit for the protection of security holders of the Fund.

VALUATION AND ACCOUNTING PROCEDURES

The Fund's investment securities shall be valued based on the valuation standards specified under PAS Nos. 32 and PFRS No. 9 and other amendments to the said standards. The NAV per Share (NAVPS) shall be obtained by dividing the market value of the assets of the Fund, less the value of its liabilities, reserves for expenses and adjustments for market risk, by the total number of Shares outstanding at such valuation date. (See "Determination of the Funds' Net Asset Value" below.)

The Fund shall secure the services of an independent auditor to verify its financial statements at least on an annual basis.

DETERMINATION OF THE FUND'S NET ASSET VALUE

The Net Asset Value per Share of the Fund, as of the close of any valuation day (the "Close"), shall be obtained by dividing the value of the assets of the Fund less the value of its liabilities, reserves for expenses and adjustments for market risk, by the total number of Shares outstanding at such Close, all to be determined as follows:

1. The assets of the Fund shall be deemed to include:

(i) all cash on hand, on deposit, or on call; (ii) all bills and notes and accounts receivable; (iii) all shares of stock and subscription rights and other securities owned or contracted for by the Fund, other than its own capital stock; (iv) all stock dividends to be received by the Fund and not yet received by it but declared to stockholders of record, on a date on or before the date as of which the Net Asset Value is being determined; (v) all interest accrued on any interest bearing securities owned by the Fund; (vi) all real properties or interest therein; and (vii) all other properties of every kind and nature including prepaid expenses.

2. The liabilities of the Fund shall be deemed to include:

(i) all bills and notes and accounts payable; (ii) all administrative expenses payable and/or accrued (including management fees and custody expenses); (iii) all contractual obligations for the payment of money or property; (iv) all reserves for expenses and adjustments for market risk; and (v) all the other liabilities of the Fund of any kind and nature whatsoever, except liabilities represented by the outstanding capital stock and surplus of the Fund.

3. For the purposes thereof:

(i) capital stock subscribed for shall be deemed to be outstanding as of the time of acceptance of any subscription and the entry thereof in the books of the Fund, and the net proceeds thereof shall be deemed to be an asset of the Fund; and (ii) capital stock surrendered for purchase by the Fund pursuant to the provisions of its Articles of Incorporation or By-Laws shall be deemed to be outstanding until the

close of business on the business day as of which such Net Asset Value is being determined and, thereupon and until paid, the price thereof shall be deemed to be a liability of the Fund.

On every valuation day, the Fund Manager shall compute the NAV per Share and shall provide the same to the Fund's Distributors. The Fund Manager shall cause the regular publication of the Fund's NAV per Share on the Fund's website, the Distributor's website, and premises.

The Fund sets up a provision for market risk on its investment portfolio which is deducted from the Fund's net asset value to protect the Fund from market price fluctuations. To estimate its exposure to market risk, the Fund Manager computes the statistical "value at risk" (VAR) of its investments. The VAR measurement estimates the maximum loss due to adverse market movements that could be incurred by the portfolio during a given holding period with a given level of confidence. The Fund Manager uses a one month holding period, estimated as the number of days required to liquidate the investment portfolio, and a 99% degree of confidence in the computation of VAR. As such, there remains a 1% statistical probability that the portfolio's actual loss could be greater than the VAR estimate.

TAXATION

Section 32 of Republic Act 8424 excludes the gains from redemption of shares in mutual funds from the computation of gross taxable income. However, investors are advised to consult their own professional advisers as to the tax implications of subscribing for, purchasing, holding and redeeming shares of the Fund. Tax rulings and other investment factors are subject to rapid change.

INVESTMENT OBJECTIVES AND RESTRICTIONS OF THE FUND

The primary investment objective of ALFM Euro is capital preservation with returns and inflows derived from primarily foreign currency denominated investment securities issued by local and foreign entities calculated to give the Fund a steady stream of fixed income.

In line with its stated investment objective, the Fund shall invest in primarily Euro-denominated fixed-income securities such as, but not limited to, government securities and debt instruments issued by or guaranteed by the Philippine or major foreign governments, Treasury Bills / Notes, foreign currency denominated loans, Certificates of Deposit and other deposit substitutes issued by commercial banks, financial institutions, and supranationals. The investments of Fund shall be in, but are not limited to, the following major currencies: Euro, U.S. Dollar, British Pound, Canadian Dollar, Australian Dollar, Swiss Franc, Danish Kroner, and Japanese Yen. Notwithstanding the foregoing, the Fund shall have a base currency in Euros.

The Fund shall pursue a general investment policy of maintaining an optimal balance between maximizing long-term investment returns and minimizing investment risk by the proper allocation of assets among selected marketable securities and instruments depending on prevailing and anticipated market conditions.

CHANGE IN INVESTMENT OBJECTIVES

The investment objectives of the Fund may not be changed without the approval of the Shareholders owning at least a majority of the respective Fund's outstanding capital stock, present in person or by proxy at a meeting called for such purpose.

INVESTMENT LIMITATIONS

In investing the assets of an Investment Company, the Fund Manager shall comply with the following limitations:

- a. The maximum investment of an Investment Company in any single enterprise or issuer shall not exceed an amount equivalent to fifteen percent (15%) of its net assets, nor shall the total investment of the fund exceed ten percent (10%) of the outstanding securities of the investee company.
- b. The Investment Company must not invest, in aggregate, more than twenty percent (20%) of its net assets in transferrable securities, money market securities, deposits and financial derivatives issued by a single entity or issuer.
- c. Deposits shall not exceed twenty percent (20%) of its net assets in a single bank/non-bank with quasi bank license excluding monies for liquidation of a revoked Investment Company.
- d. The investments in the following shall not exceed five percent (5%) of the net assets of the Investment Company:
 - i. Deposits placed with a non-investment grade or unrated deposit taking institution;
 - ii. Debt securities or money market instruments not dealt in an organized market or issued by an unrated or non-investment grade issuing body; and
 - iii. Over-the-counter financial derivatives with non-investment grade or unrated counterparty, unless the derivatives are used for efficient portfolio management which the investment aggregate shall not exceed more than twenty percent (20%) of the assets of the Investment Company;
 - iv. Unlisted shares issued by a related party.

The aggregate investments shall not exceed ten percent (10%).

- e. Investment in foreign government debt securities or money markets where the issuer or the guarantor is a government, sovereign or central bank with an international long-term issuer rating of investment grade may be increased to a maximum of thirty five percent (35%) of the net assets of the Investment Company;
- f. A maximum of five percent (5%) of the net assets of the Investment Company may be invested in government debt securities issued or guaranteed by a government, sovereign or central bank with an international long-term issuer rating that is non-investment grade;

- g. In investing in financial derivative instruments for the Investment Company, the Fund Manager shall see to it that it employs a risk-management process which captures the risks associated with the use of financial derivatives and satisfies all the following requirements:
 - i. The total exposure to financial derivatives or embedded financial derivatives, including counterparty transactions, shall not exceed ten percent (10%) of the net assets of the Investment Company, or five percent (5%) of the net assets if the derivatives are not investment grade, unless the derivatives counterparty is used for efficient portfolio management which the investment aggregate shall not exceed more than twenty percent (20%);
 - ii. The Investment Company shall invest five percent (5%) of its net assets to liquid assets to meet all its payment and delivery obligations;
 - iii. The Fund Manager shall not act as a counterparty to an OTC derivative invested into by the Investment Company.
- h. The MFC shall be prohibited from investing in the securities it is issuing.
- i. No Investment Company shall purchase from or sell to any of its officers or directors or the officers or directors of its investment advisor/s, manager or distributor/s or firm/s of which any of them are members, any securities other than the capital stock of the Investment Company.
- j. The Investment Company shall not engage in short selling;
- k. Unless the Commission shall provide otherwise, the Investment Company shall not invest in any of the following:
 - i. margin purchase of securities (investment in partly paid shares are excluded);
 - ii. commodity futures contracts;
 - iii. precious metals; and
 - iv. unlimited liability investments.

Liquidity Requirements

For liquidity purposes, unless otherwise prescribed by the Commission, at least ten percent (10%) of the assets of an Investment Company shall be invested in liquid/semi-liquid assets.

- a. Such liquid/semi-liquid assets shall refer to, but not limited to the following:
 - i. Treasury notes or bills, Certificates of Indebtedness issued by the Bangko Sentral ng Pilipinas which are short term, and other government securities or bonds and such other evidence of indebtedness or obligations, the servicing and repayment of which are fully guaranteed by the Republic of the Philippines;
 - ii. Tradable Long-Term Negotiable Certificate of Time Deposits (LTNCTD)
 - iii. Government debt securities where the issuer or the guarantor is a foreign government, sovereign or central bank with an international long-term issuer rating of investment grade;
 - iv. Savings or time deposits with government-owned banks or commercial banks, provided that in no case shall any such savings or time deposit accounts be accepted or allowed under a “bearer”, “numbered” account or other similar arrangement.
 - v. Money market instruments issued by Philippine regulated qualified buyers or those issued by an investment grade issuing body;
 - vi. Other collective schemes wholly invested in liquid/semi-liquid assets.
- b. The MFC may implement a decreased investment of less than ten percent (10%) but not less than five percent (5%) of its assets in liquid/semi-liquid assets, provided, however, that it shall submit a notarized liquidity contingency plan, signed by the President of the Fund and its Fund Manager.

Other Limitations

Operational expenses

The total operating expenses of an Investment Company shall not exceed ten percent (10%) of its average investment fund or net worth as shown in its previous Audited Financial Statements covering the immediately preceding fiscal year.

The formula shall be as follows: $\text{Expense Ratio \%} = (\text{Total Operating Expenses} / \text{Average Net Asset Value}) \times 100$.

Borrowing limit

An Investment Company may borrow, on a temporary basis, for the purpose of meeting redemptions and bridging requirements provided that:

- a. The borrowing period should not exceed one month; and
- b. The aggregate borrowings shall not exceed ten percent (10%) of the net assets of the Investment Company.

The Investment Company shall not incur any further debt or borrowing unless at the time of its incurrence or immediately thereafter there is an asset coverage of at least three hundred percent (300%) for all borrowings of the Investment Company. Provided, however, that in the event that such asset coverage shall at any time fall below three hundred percent (300%), the Investment Company shall within three (3) days thereafter, reduce the amount of its borrowings to an extent that the asset coverage of such borrowings shall be at least three hundred percent (300%).

PHILIPPINE LAWS APPLICABLE TO THE COMPANY

INVESTMENT COMPANY ACT OF 1960

- The Investment Company Act of 1960 primarily regulates the business of investment companies. Subject to the exceptions under the law, an investment company is any issuer, which is or holds itself out as being engaged primarily, or proposes to engage primarily, in the business of investing, re-investing, or trading in securities. An investment company is either (a) an open-end company; or (b) a closed-end company. An open-end company is an investment company, which is offering for sale or has outstanding, redeemable securities of which it is the issuer. A closed-end company, on the other hand, is an investment company other than an open-end company. The Investment Company Act provides for separate rules for each kind of investment company.

To be incorporated as an investment company, the following requirements should be complied with:

1. Minimum subscribed and paid-in capital of PhP 50.0 Million.
2. All shares of stock should be common and voting shares.
3. In the case of open-end companies, the Articles of Incorporation thereof should expressly waive the preemptive rights of stockholders.
4. All Filipino membership in the Board of Directors.

The Investment Company Act requires the registration of the investment company under said Act. The shares of the investment company are required to be registered under the Securities Regulation Code. The Investment Company Act also requires an investment company to place and maintain its securities and similar investments in the custody of a duly organized local commercial bank of good repute, duly authorized by the BSP to perform trust functions.

DIVIDENDS

A corporation may declare dividends only out of its unrestricted retained earnings. These represent the net accumulated earnings of the corporation, with its capital unimpaired, which are not appropriated for any other purpose. The corporation may satisfy dividends in cash, by the distribution of property, or by the issue of shares of stock. Dividends satisfied by the issuance of shares may be paid only with the approval of shareholders representing at least two-thirds (2/3) of the outstanding capital stock at a shareholders' meeting called for such purpose.

The declaration of dividends is generally discretionary with the Board of Directors. However, corporations with surplus profits in excess of 100% of their paid-up capital are required to declare and distribute the amount of such profits and dividends, except when the retention is justified by definite corporate expansion projects or programs approved by the Board of Directors, or when the consent of creditors is required under any loan agreement or when it can be clearly shown that such retention is necessary under special circumstances.

RIGHTS OF SHAREHOLDERS

The right of shareholders to institute proceedings on behalf of the corporation in a derivative suit is recognized in Philippine jurisdiction. Derivative suits may be filed where the corporation itself is unable or unwilling to institute the necessary proceedings to redress a wrong committed against the corporation or to vindicate corporate rights. Derivative suits as a rule are filed with the SEC. Jurisdiction over intra-corporate disputes is transferred to the regular Courts.

A shareholder has a right to dissent and demand payment of the fair value of his shares in the following instances: any amendment of the Articles of Incorporation which has the effect of changing or restricting rights attached to his shares, or of extending or shortening the term of corporate existence, the sale/lease or other disposition of all or substantially all of the assets of the corporation, or a merger or consolidation of the

corporation with another corporation. The fair value at which the shares of a dissenting shareholder may be sold to the corporation may be agreed upon by the parties. If they cannot reach agreement, it shall be determined by an independent committee. Payment of the shares of a dissenting shareholder may be made only if the corporation has unrestricted retained earnings to purchase the shares.

MANAGEMENT

Corporate powers are exercised, and all business of a corporation is conducted, by the Board of Directors. However, the powers of the Board of Directors are not unlimited. Certain corporate acts may be effected only with the approval of shareholders representing at least two-thirds (2/3) of the outstanding capital stock at a shareholders meeting convened for the purpose. Matters requiring such shareholders' approval include the amendment of the Articles of Incorporation, removal of directors, the sale, lease, exchange, mortgage, pledge or other disposition of all or substantially all of the assets of the corporation, and the investment of corporate funds in another corporation or business or for any purpose other than the primary purpose for which the corporation was organized.

GOVERNMENT POLICIES AND REGULATIONS

The Fund falls under the category of Investment Company which is regulated by the Philippine Government through the Securities and Exchange Commission and several laws. Investment companies are required to be incorporated pursuant to the Corporation Code of the Philippines or *Batas Pambansa Blg. 68* (the “Corporation Code”). Aside from the incorporation requirements, investment companies are required to be registered either as an open-end or a closed-end investment company following the rules found under the Investment Company Act. Securities issued by an investment company are required to be registered following the rules of the Securities Regulation Code. The regulating body tasked with the implementation of the aforementioned laws is the SEC.

THE SECURITIES AND EXCHANGE COMMISSION

Under the Securities Regulation Code, the SEC is responsible for regulating the securities market. The SEC is a quasi-judicial government agency under the administrative supervision of the Department of Finance.

The SEC is headed by a chairperson and four (4) associate commissioners who are appointed by the President of the Philippines for a term of seven (7) years. The SEC is responsible for the registration of securities proposed to be listed on the PSE, the registration of securities proposed to be offered to the public, the regulation of the securities markets, the licensing of securities brokers and dealers, the promulgation of rules and regulations on securities trading, and the issuance of opinions and rulings pertaining to the proper application of the Corporation Code, the Securities Regulation Code, the Investment Company Act, and certain other statutes.

The SEC’s departments that regulate investment companies are the Company Registration and Monitoring Department, the Corporation Finance Department, and the Market Regulation Department.

THE INVESTMENT COMPANY ACT OF 1960

The Investment Company Act (Republic Act No. 2629) contains the various rules and regulations for corporations which may wish to engage in the business of primarily investing, re-investing, or trading in securities. The Act, however, excludes from its broad definition of “investment companies” such entities as banks, insurance companies, employees’ stock bonus plans, pension plans, and profit-sharing plans.

For purposes of the Act, investment companies are divided into open-end and closed-end companies, defined as follows: (i) “open-end company” means an investment company which is offering for sale, or has outstanding, any redeemable security of which it is the issuer; and (ii) “closed-end company” means any investment company other than an open-end company.

The Act provides for several rules relative to the incorporation of investment companies, the most basic of which are as follows: (i) the subscribed and paid-up capital of the investment company must be at least PhP 50.0 Million; (ii) all shares of capital stock must be common and voting shares, and, in the case of open-end companies, the Articles of Incorporation must waive the preemptive rights of shareholders; and (iii) all members of the Board of Directors must be Filipino citizens.

THE SECURITIES REGULATION CODE

The Securities Regulation Code (Republic Act No. 8799) provides that securities which are to be offered or sold to the public in the Philippines must first be registered with the SEC (except for certain securities exempt from the registration requirements and securities to be sold in certain exempt transactions). The Securities Regulation Code also requires companies listed in the stock exchange and companies whose securities are registered under the said law to submit periodically corporate information and financial statements.

MANAGEMENT DISCUSSION OR ANALYSIS ON PLAN OF OPERATIONS

AS OF DECEMBER 31, 2018

2018 was a year of negative returns for all asset class except for the money market industry. Foreign funds went out of Emerging Market largely on the back of China's trouble fear as its equity mainland shares in CSI300 index plummeted to a year-to-date return of negative 26% and its escalating rheutoic trade war with the United States. To top it off, there was a contagion fear that the other countries will be affected by the US-China trade relations, US' sanction versus Iran and the volatile oil market which saw oil prices going up as high as US\$70/barrel to US\$40/ barrel. 2018 was also the year where we actually saw the real effect of the end of the US' quantitative easing as the US Federal hiked four times from 1.25% -1.50% range to 2.25% -2.50% range, the fastest hike since 2015. Asian Central Banks followed suit to protect its own currencies from depreciating versus the strengthening US Dollar. Despite the four hikes in the US, the US ten-year treasuries only rose 20 basis points from 2.40% to 2.64% by year-end.

In Europe, the European Union's GDP growth printed strong in the first half but showed a tepid growth in the second half. Despite the development, the European Central Bank have decided to end its own quantitative easing by December of 2018 but remained dovish to maintain its policy rate for an extended period of time citing risks from the global growth slowdown which could stem from the escalating US-China trade war and its moderating core inflation.

For the first half of the year, the 10-year German Bunds yield initially inclined to as high as 35 basis points to 0.765% on the back of good economic data and market anticipation of end of ECB's quantitative easing. However, economic and inflation data started to show weaknesses as the year progressed and monetary policy hike is no longer on the plate of the ECB in the near future, 10-year Bunds declined to 0.227%, much lower than 2017 year-end of 0.423%. The divorce of Britain from the European Union also led to volatility of the bond market for the year.

ALFM Euro Bond Fund's net asset value stood at EUR 11.53 million as of end 2018. The fund aims to be well diversified with 2.09% of the fund's investment is in cash and accrued interest- net of receivables/liabilities/allowances, 67.16% in corporate bonds and 30.75% in government bonds. As of December 2018, the fund had a duration of 4.55. For 2018, due to the implementation of the new accounting standard PFRS9, the fund now holds hold-to-collect security on the back of its business model which is to give investors a steady stream of income by investing in a diversified portfolio of fixed income securities.

The Fund posted a full year loss of 0.50%, net of fees and taxes, still outperforming its benchmark, the 3-Month German Treasury Bill which returned negative 0.69%. The outperformance of the fund is attributed to the overweight position in the Asian Sovereign and Investment Grade bonds as the hunt for yield continues in Emerging Asia with the ECB maintaining its dovish policy stance. The negative return for both the Fund and the benchmark was widely affected due to the projection of the market in the 1H of the year where investors anticipated of a more hawkish ECB which didn't panned out as the 10-year bunds ended 2018 much lower than in 2017.

Notable deployment of the operating cash was to book investment securities at amortized cost when yields were notably high. Short-term investments were depleted as positive-carry of Euro Time Deposit is no longer available.

Moving forward to 2019, expect global economy to grow but at a tepid pace depending largely on the on-going US-China trade talk and geopolitical risks globally. We expect the US Federal Reserve to continue its path to rate normalization and hike one to two more times for the year. ECB is expected to maintain its monetary policy throughout 2019 on the back of various elections across Europe including the change of presidency for the ECB, EU Parliament, EU Commission and EU Council.

Cautious optimism will be largely predominant as there are a couple of downside risks namely the global growth slowdown largely led by China as shown in its weakening manufacturing data, geopolitical risk in Iran and Valenzuela, and the inflationary risk of oil which is largely dependent on the supply production.

Given this, the Fund will be defensive amidst the expected rising interest environment. Nevertheless, the fund is ready to take a position to take advantage of any volatility that may arise as the bond market is quite dynamic. The Fund will continue to favor highly rated Emerging Market securities for yield.

TOP FIVE KEY PERFORMANCE INDICATORS

1. **Performance vis-à-vis the Benchmark** – As of December 2018, the Fund posted a full year loss of 0.50% p.a., net of fees and taxes, outperforming its benchmark 3-Month German Treasury Bill by 19 basis points.
2. **NAV Growth vis-à-vis Industry Growth** - The Fund's average daily NAV for 2018 was at EUR 11.48 Million. ALFM Euro Bond Fund's trading net asset value ended 2018 at EUR 11.53 Million compared the previous year of EUR 11.34 Million or a 1.69% increase. The industry's net asset value also increased by the same magnitude for the same period as ALFM Euro is the lone Euro Fixed Income Fund in the country.
3. **Portfolio Quality** – The fund aims to be well diversified with 2.09% of the fund's investment is in cash and accrued interest- net of receivables/liabilities/allowances, 67.16% in corporate bonds and 30.75% in government bonds. As of December 2018, the fund had a duration of 4.55.
4. **Performance vis-à-vis Competition** – ALFM Euro posted a full year loss of 0.50% and it has no competition in the same category.
5. **Market Share in the Industry** - ALFM Euro is the lone Euro-denominated fixed income mutual fund.

Findings of SEC's Office of the General Accountant (OGA) upon review of the Fund's Unaudited Interim Financial Statements (UIFS) for the period ended September 30, 2018

Notes to Financial Statements (Changes in accounting policies and disclosures)

There are no disclosures on the Company's adoption of PFRS 9 and PFRS 15. The said standards have been effective beginning January 1, 2018, thus, the Company should have already adopted the same.

Likewise, the impact of adopting the said standards should be disclosed in the UIFS.

Response of Company

The company will include below disclosures in future submission of Financial Statements.

Changes in Accounting Policies and Disclosures

The accounting policies adopted are consistent with those of the previous financial year, except that the Fund has adopted the following new accounting pronouncements starting January 1, 2018. The Adoption of these pronouncements did not have any significant impact on the Fund's financial position or performance unless otherwise indicated.

- Amendments to PFRS 12, *Disclosure of Interests in Other Entities, Clarification of the Scope of the Standard* (Part of Annual Improvements to PFRSs 2014 - 2016 Cycle)
 - Amendments to Philippine Accounting Standard (PAS) 7, *Statement of Cash Flows, Disclosure Initiative*
 - Amendments to PAS 12, *Income Taxes, Recognition of Deferred Tax Assets for Unrealized Losses*
 - Amendments to PFRS 2, *Share-based Payment, Classification and Measurement of Share-based Payment Transactions*
 - Amendments to PFRS 4, *Insurance Contracts, Applying PFRS 9, Financial Instruments,*
 - *with PFRS 4*
 - PFRS 15, *Revenue from Contracts with Customer*
 - PFRS 9, *Financial Instruments*
PFRS 9 reflects all phases of the financial instruments project and replaces PAS 39, *Financial Instruments: Recognition and Measurement*, and all previous versions of PFRS 9. The standard introduces new requirements for classification and measurement, impairment, and hedge accounting. Retrospective application is required but providing comparative information is not compulsory.
- a. Classification and Measurement
- Having completed its assessment on the classification and measurement of its financial assets, the Fund has concluded the following:
- Financial assets classified as loans and receivables under PAS 39 are expected to be measured at amortized cost under PFRS 9.
 - Financial assets held for trading and financial assets designated at FVPL are expected to continue to be measured at FVTPL.

- Debt securities classified as held-to-maturity (HTM) are expected to continue to be measured at amortized cost.
- b. Impairment
The new impairment model requires the recognition of impairment provisions based on expected credit losses (ECL) rather than only incurred credit losses as is the case under PAS 39. It applies to financial assets classified at amortized cost, debt instruments measured at FVOCI, loan commitments and certain financial guarantee contracts.

The Fund fully adopt the new standard on the mandatory effective date and will not restate comparative information.

The Fund adopted the following standards effective January 1, 2018:

- *PFRS 15, 'Revenue from contracts with customers'* replaces PAS 18, 'Revenue'; which covers contracts for goods and services and PAS 11, 'Construction contracts' which covers construction contracts. The new standard is based on the principle that revenue is recognized when control of a good or service transfers to a customer - so the notion of control replaces the existing notion of risks and rewards. A new five-step process must be applied before revenue can be recognized: (1) identify contracts with customers, (2) identify the separate performance obligation, (3) determine the transaction price of the contract, (4) allocate the transaction price to each of the separate performance obligations, and (5) recognize the revenue as each performance obligation is satisfied.

The impact of PFRS 15 adoption did not result to a significant change in the revenue recognition of the Fund.

Notes to Financial Statements (Financial Assets)

The following information are not disclosed in the UIFS:

- a. The original measurement category and carrying amount determined in the earlier version of PFRS 9;
- b. The new measurement category and carrying amount determined in accordance with the revised PFRS 9;
- c. The amount of any financial assets and financial liabilities in the statement of financial position that were previously designated as measured at fair value through profit or loss but are no longer so designated, distinguishing between those that PFRS 9 requires an entity to reclassify and those that an entity elects to reclassify.

The company should present these quantitative disclosures in tabular format unless another format is appropriate.

Response of Company

The company will include below disclosures in future submission of Financial Statements.

PFRS 9 adoption

The adoption of PFRS 9 resulted in changes in accounting policies and adjustments to the amounts previously recognized in the financial statements. The Fund did not early adopt any provisions of PFRS 9 in previous periods.

As permitted by the transitional provisions of PFRS 9, the Fund elected not to restate comparative figures.

The adoption of PFRS 9 has resulted in changes mainly in the Fund's accounting policies for recognition, classification and measurement and impairment of financial assets. There were no changes in the classification of financial liabilities. PFRS 9 also significantly amends other standards dealing with financial instruments such as PFRS 7, Financial Instruments: Disclosures.

Set out below are disclosures relating to the impact of the adoption of PFRS 9 on the Fund.

- (a) Classification and measurement of financial assets

The measurement category and the carrying amount of financial assets in accordance with PAS 39 and PFRS 9 at January 1, 2018 are as follows:

	PFRS 9		PAS 39	
	January 1, 2018		December 31, 2017	
Financial instruments	Measurement category	Carrying amount	Measurement category	Carrying amount
Cash and other cash items	Amortized Cost	392,440	Fair value through profit or loss (FVTPL)	392,440
Short-term investments	Amortized Cost	3,400,047	Fair value through profit or loss (FVTPL)	3,400,047
Investment securities	Fair value through profit or loss (FVTPL)	7,376,503	Fair value through profit or loss (FVTPL)	6,490,417
	Amortized Cost	206,182	Available-for-sale securities	1,092,268

(b) Reconciliation of statement of condition balances from PAS 39 to PFRS 9.

The financial assets affected by the adoption of the new standard are shown below. The reconciliation of the carrying amounts of these financial assets, from their previous measurement category in accordance with PAS 39 to their new measurement categories upon transition to PFRS 9 on January 1, 2018 follows:

		Investment securities at FVPL	Available-for-sale securities	Held to maturity (HTM)
Closing balance, December 31, 2017 - PAS 39		6,490,417	1,092,268	-
Reclassifications from:				
Available-for-sale to FVTPL	a	886,086	(886,086)	-
Available-for-sale to amortized cost	b	-	(206,182)	206,182
HTM to FVOCI	c	-	-	-
HTM to amortized cost*	d	-	-	-
Opening balance, January 1, 2018 - PFRS 9		7,376,503	-	206,182

AS OF DECEMBER 31, 2017

2017 is the year full of surprises despite the political headlines that grabbed the market. Global equity market returned double-digit amidst strong global growth and modest inflation that gave robust corporate earnings. 2017 was a roller-coaster for the US as it started the year with investors enthusiastic with the pro-business agenda of Trump, which was later on plagued with failed attempts to reform healthcare and travel bans, word war with North Korea and the frequent turnover of President Trump's personnels.

In Europe, the European Union's GDP growth printed strong and there was a continuity of its accommodative economic stance. In the quiet political front, Emmanuel Macron won the French election which further strengthened the unity in the region with his pro-Euro agenda. The Euro currency benefitted from the improved economic environment and was 14.1% up versus the US Dollar. Japan has also remained to be ultra-conservative and maintained its negative interest rate policy.

Fixed income also returned positively despite the on-and-off reflation trade view that dominated the latter half of the year, along with the hikes (three times) made by the US Fed. As a result, yield curve flattened with the short-term rates rising faster than ever but the long-term yields failed to rise as inflation remains moderate. Global bond yields, in general, were weighed down by the monetary policy of Europe and Japan.

For the first half of the year, the 10-year German Bunds yield initially inclined by 26 basis points from January to July and subsequently declined by 4 basis points; ending the year at 0.42% or 22 basis points higher than December 2016. This is mainly due to the market speculation that the Quantitative Easing will be phased out within the year but was only reduced and extended to 2018.

ALFM Euro Bond Fund's net asset value stood at EUR 11.34 million as of December 31, 2017. The fund aims to be well diversified with 33.82% of the fund's investment is in cash and deposit instruments- net of receivables, 41.78% in corporate bonds and 24.40% in government bonds. As of December 2017, the fund had a duration of 4.13. The fund does not hold any held-till-maturity securities as it has sold more than an insignificant amount of certain securities in the year 2016, which led to the tainting of the whole portfolio.

The Fund posted a full year return of 1.975%, net of fees and taxes, outperforming its benchmark, the 3-Month German Treasury Bill which returned negative 0.86%. The outperformance of the fund is attributed to the overweight position in the Indonesian Sovereign bonds as the hunt for yield continues in Emerging Asia with the ECB maintaining its policy stance and extending the Quantitative Programme to 2018.

Management fee was lowered for the year at 0.375% p.a. from 0.75% p.a. This resulted to a lower expense charged to the fund but the Net Income of the Fund came out lower for the year at EUR 165 Thousand as the overall expense was negated by higher income tax expense due to lower allocation in investments with lower tax rate or with final withholding tax such as local time deposits with rates almost nearing zero in 2017. As a result, Earnings per Share dropped to EUR 3.13 versus EUR 4.69 in 2016.

Other notable increase for the year was the Deferred Income Tax Liability of EUR 44 Thousand as the unrealized fair value gain through profit or loss securities, as well as, the unrealized gain on Available-For-Sale securities which rose close to EUR 43 Thousand for the year.

Moving forward to 2018, expect global economy to remain buoyant with moderate inflation. We also expect the US Federal Reserve will continue its path to rate normalization and hike two to three times regardless who will be the next Fed Chairman as Janet Yellen steps down in early February. ECB is expected to be slightly hawkish as it ends its Quantitative Easing Programme by end of the year. Something to look out for in the middle of 2018 on who will be the next ECB president with Draghi's term ending in 2019. Inflation is also expected to pick up in the European region along with its economic data. EU's GDP will be consistently growing but at a sluggish pace.

Given this, the Fund will be defensive amidst the expected rising interest environment. Nevertheless, the fund is ready to take a position to take advantage of any volatility that may arise as the bond market is quite dynamic. The Fund will continue to favor highly rated Emerging Market securities for yield.

TOP FIVE KEY PERFORMANCE INDICATORS

1. ***Performance vis-à-vis the Benchmark*** – As of December 2017, the Fund posted a full year return of 1.975% p.a., net of fees and taxes, outperforming its benchmark 3-Month German Treasury Bill by 238 basis points.
2. ***NAV Growth vis-à-vis Industry Growth*** - The Fund's average daily NAV for 2017 was at EUR 11.16 Million. ALFM Euro Bond Fund's net asset value ended 2017 at EUR 11.34 Million compared the previous year of EUR 10.79 Million or a 5.097% increase. The industry's net asset value also increased by the same magnitude for the same period as ALFM Euro is the lone Euro Fixed Income Fund in the country.
3. ***Portfolio Quality*** – The fund aims to be well diversified with 33.82% of the fund's investment is in cash and deposit instruments- net of receivables, 41.78% in corporate bonds and 24.40% in government bonds. As of December 2017, the fund had a duration of 4.13.
4. ***Performance vis-à-vis Competition*** – ALFM Euro posted a full year return of 1.975% and it no longer has a competition in the Euro fixed income mutual fund segment.
5. ***Market Share in the Industry*** - ALFM Euro is the lone Euro-denominated fixed income mutual fund.

AS OF DECEMBER 31, 2016

2016, similar to the prior year, continued to be a challenging and turbulent year for the fixed income market. It was predominantly remembered as a year full of political surprises. Starting off onshore with the electoral win of Ex- Davao Mayor Rodrigo Duterte to the Philippine presidency in May, followed by the British electorate in June to leave the European Union and the election of Donald Trump to the US presidency in November. All of these political changes will continue to have ramification in 2017 with the uncertainties of its respective economies as well as the campaign promises of trade protectionism and anti-immigration should become policies in the US and UK.

China, the world's second largest economy, also didn't escape 2016 unscathed. In the first week of the year, its stock market tumbled and sent shock waves around the world reviving concerns on China's sustainable growth.

Despite China's rough start in 2016, it ended the year with a 6.7% growth, above the government's target. In March 2016, China adopted the 13th version of its Five-Year Plan where it outlined the country's goals, principles and development from 2016 to 2020 where it had set its annual growth target of 6.5%. On the positive side, the Chinese Yuan, in recognition of China's key role in the world economy, was added to the basket of reserve currencies by the International Monetary Fund; alongside the US Dollar, British Sterling, Euro and Japanese Yen.

In Europe, the European Central Bank pledged to continue its Asset Purchase Programme (APP) at the current pace of €80 Billion until end of March 2017. Thereafter, the monthly purchase will be reduced to €60 Billion until end of 2017, or beyond if necessary. If in any case, the economic condition becomes less favorable, the ECB can increase the size or duration of the programme. Purchases below the interest rate on the deposit facility will also be permitted in the APP. As of December 2016, the interest rates for the main refinancing operations, marginal lending facility and deposit remained unchanged at 0.00%, 0.25% and -0.40%.

For the year, the 10-year German Bunds yield initially declined by 82 basis points from January to July and subsequently rose and ended the year 0.175% or 45 basis points lower than January level.

ALFM Euro Bond Fund's net asset value stood at EUR 10.79 million as of December 31, 2016. The fund aims to be well diversified with 27.23% of the fund's investment is in cash and deposit instruments, 52.27% in corporate bonds and 20.50% in government bonds. As of December 2015, the fund had a duration of 2.37.

The Fund posted a full year return of 1.67% p.a., net of fees and taxes, outperforming its benchmark, the 3-Month German Treasury Bill which returned negative 0.33% p.a. The outperformance could be attributed to the dovish sentiment set by the European Central Bank where they had widened the parameter of their security buy back to include corporate bonds issued by European companies.

Total assets amounted to EUR 10.92 million, higher than previous year's EUR 9.64 million. Net gain on securities tripled for 2016 as the unrealized loss was reversed from negative 382 thousand to positive 46.6 thousand. The fund no longer holds held-till-maturity securities as it has sold more than an insignificant amount of certain securities in the year, which led to the tainting of the whole portfolio.

Moving forward to 2017, expect global political risks to occupy the headlines. France and Germany will hold their respective national elections and with the new governments in place, the world will watch how the new and existing economic policies set by their predecessor will affect global trade and their own respective country. The rest of the European countries will watch whether Britain will trigger the Article 50 (from the Treaty of Lisbon, where it outlines the procedure in leaving the European Union. It essentially gives the country two years to negotiate an exit deal with other member country) after their referendum to leave the EU as it will become precedent for any country who wishes to leave the EU. A successful negotiation of Britain, would mean we might see other member countries to follow suit. We also expect the US Federal Reserve will continue its path to rate normalization and hike two to three times and for ECB to become less accommodative as they end their APP. Expect volatility throughout the year for the European bonds in response to political noise.

TOP FIVE KEY PERFORMANCE INDICATORS

1. ***Performance vis-à-vis the Benchmark*** – As of December 2016, the Fund posted a full year return of 1.67% p.a., net of fees and taxes, outperforming its benchmark 3-Month German Treasury Bill by 237 basis points.
2. ***NAV Growth vis-à-vis Industry Growth*** - The Fund's average daily NAV for 2016 was at EUR 10.19 Million. ALFM Euro Bond Fund's net asset value ended 2016 at EUR 10.79 Million compared the previous year of EUR 9.57 Million or a 12.74% increase. The industry's net asset value also increased by the same magnitude for the same period.
3. ***Portfolio Quality*** – The fund aims to be well diversified with 27.23% of the fund's investment is in cash and deposit instruments, 52.27% in corporate bonds and 20.50% in government bonds. As of December 2015, the fund had a duration of 2.37.
4. ***Performance vis-à-vis Competition*** – ALFM Euro posted a full year return of 1.67% and it no longer has a competition in the Euro fixed income mutual fund segment.
5. ***Market Share in the Industry*** - ALFM Euro is the lone Euro-denominated fixed income mutual fund.

Discussion and analysis of material event/s and uncertainties known to the management that would address the past and would have an impact on future operations

Any known trends, demands, commitments, events or uncertainties that will have material impact on the issuer's liquidity:

Liquidity of the fund may be affected by the market's depth or the existence of readily available buyers and sellers in the market.

Any events that will trigger direct or contingent financial obligation that is material to the company, including any default or acceleration of an obligation:

None

All material off-balance sheet transactions, arrangements, obligations (including contingent obligations), and other relationships of the company with unconsolidated entities or other persons created during the reporting period:

None

Any material commitments for capital expenditures, general purpose of such commitments, expected sources of funds for such expenditures:

None

Any known trends, events or uncertainties that have had or that are reasonably expected to have a material favorable or unfavorable impact on net sales/revenues/income from continuing operations:

None

Any significant elements of income or loss that did not arise from the issuer's continuing operations:

The Fund Manager is not aware of any significant element of income or loss that did not arise from the Fund's continuing operations.