

**Representative Share Class displayed. Professional Marketing Communication / Publicité / Financial Promotion** addressed to investors in the countries mentioned under "Registration and Target Market Definition", related to **E.I. Sturdza Funds plc - Nippon Growth (UCITS) Fund** – (hereinafter referred to as the "Fund") a sub-fund of E.I. Sturdza Funds plc, an Irish open-ended umbrella investment Company with variable capital – UCITS ("the Company"). For Professional / Institutional investors only. Singapore: Restricted scheme (this document is part of the Information Memorandum).

## Investment Objective & Policy

The investment objective of the Fund is to achieve long-term capital growth through active sector allocation and stock selection resulting from changes in economic conditions. The Fund will invest primarily in equities or other asset classes representing the return of equity securities listed on the Tokyo and Osaka Stock Exchanges.

Pursuant to the EU's Sustainable Finance Disclosure Regulation (EU) 2019/2088 ("SFDR"), the Fund is classified as a fund that promotes environmental or social characteristics. The Fund will have an averaged ESG score higher than the averaged ESG score of its initial investment universe. For more information on the Fund's investment approach with respect to sustainability and non-financial criteria, please refer to Annex I of the Fund's supplement or ericsturdza.com.

The performance of the Fund and its performance fees are measured against the TOPIX TR JPY Index (the "Index"). There is no assurance or guarantee that the Fund's investment objective will be achieved or that there will be a return on capital.

## Fund Past Performance Versus Benchmark



Graph, strategy and annualised inception performance figures are from the strategy inception in 2001, when the Nippon Growth Fund was authorised by the Guernsey Financial Services Commission ("GFSC") as an open ended collective investment scheme using the same strategy as the Fund. Performance since the 22 October 2009 is that of the Nippon Growth (UCITS) Fund.

## Annualised Return %

	1M	3M	1Y	3Y	5Y	10Y	15Y	Strategy SI
B JPY Class	0.54	3.63	30.62	29.51	22.08	11.17	10.08	7.50
TOPIX TR JPY	-0.54	2.07	23.07	16.52	15.02	10.51	9.85	5.91

## Calendar Year Return %

	YTD	2023	2022	2021	2020	2019	SI	Strategy SI
B JPY Class	29.78	31.59	16.10	27.55	-5.55	19.10	332.18	425.00
TOPIX TR JPY	19.49	28.26	-2.45	12.74	7.39	18.12	325.05	273.13

## 12 Month Returns %

	01/08/2023 - 31/07/2024	01/08/2022 - 31/07/2023	01/08/2021 - 31/07/2022	01/08/2020 - 31/07/2021	01/08/2019 - 31/07/2020
B JPY Class	30.62	35.85	22.43	40.48	-11.11
TOPIX TR JPY	23.07	22.98	4.53	29.79	-1.94

## 3 Year Performance Statistics

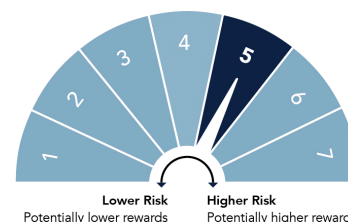
	Alpha	Beta	Sharpe Ratio	Info Ratio	Std Dev
B JPY Class	10.62	1.03	2.07	1.66	14.32
TOPIX TR JPY	0.00	1.00	1.43	—	11.66

\*Note calculation change from daily to monthly returns.

Please refer to page 7 for full benchmark disclaimer. **Past performance may not be a reliable guide to future performance. Returns could be reduced, or losses incurred, due to currency fluctuations.**

## Risk & Reward Indicator ("SRI") & Inherent Risks

The risk indicator is based on historical data and may not be a reliable indicator of the future risk profile of the Fund, is not guaranteed and may change over time. The lowest category does not mean risk free.



The EU PRIIP KID risk indicator for the Fund is set as 5, which reflects the historic price behaviour of the Fund.

UK investors can access the UCITS KIIDs / SRI from our website: [https://docs.publifund.com/kiid/IE00B97RRK58/en\\_GB](https://docs.publifund.com/kiid/IE00B97RRK58/en_GB)

The sub-fund may be subject to high volatility.

Factors that affect the indicator include: Investments in equity securities are subject to fluctuations in value dependent on market conditions which will directly affect the value of investments. The Fund invests with a focus on a single country which may increase the risk of investing when compared to a fund that invests in a globally diversified range of countries. Additional Risks: Custody and Settlement, Financial Derivatives, Liquidity, Operational and Taxation risks. For more information about potential risks, please refer to the Key Information Document (KID), the Prospectus and Supplement available at ericsturdza.com/literature/.

Source of graphs and tables: Morningstar.

The performances presented are shown after deduction of ongoing charges and performance fees. Any entry or exit fees are excluded from this calculation. Dividends reinvested. Benchmark: TOPIX TR JPY. Same reference period as for the class: Net Return, dividend reinvested. The reference benchmark of this class is used for performance comparison purposes only. The performance of the benchmark is not indicative of past or future performance of the Fund.

### Reference periods

- Annualised Returns as of the date of the reporting over the defined period. Data less than 1 year is not annualised.
- Calendar Year Returns: Annual Performance for the stated calendar year.
- 12 Month Returns: performance for the stated time frame.

When the currency presented differs from yours, changes in exchange rates may have an adverse effect on the value price or income of the product. Class currency hedging is used on non base currency classes aiming to reduce the impact of currency risk.

The performance and NAVs of all classes may be obtained at ericsturdza.com. Please refer to the glossary at ericsturdza.com/glossary for further explanation on specific terminologies.

# E.I. Sturdza Funds plc - Nippon Growth (UCITS) Fund

Professional Factsheet

Return Date: 31/07/2024



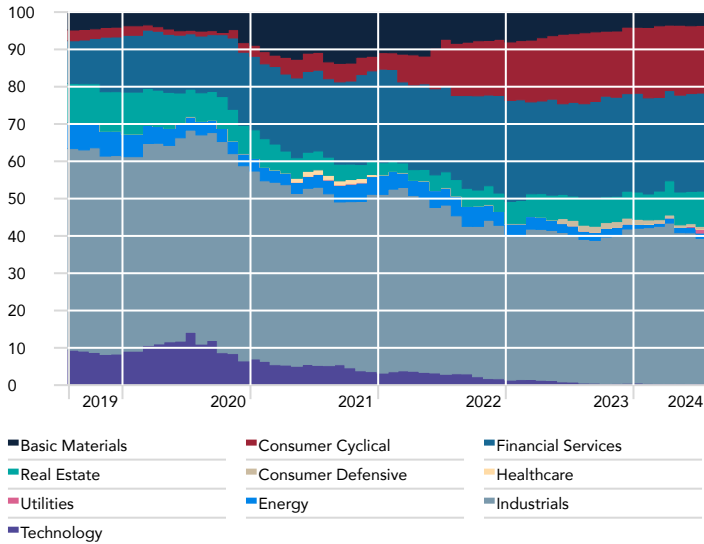
## Top Holdings

	Sector	Weighting %
ITOCHU Corp	Industrials	7.62
Sumitomo Mitsui Financial Group Inc	Financial Services	7.56
Mitsubishi UFJ Financial Group Inc	Financial Services	7.13
Mizuho Financial Group Inc	Financial Services	4.64
Mitsubishi Corp	Industrials	4.61

## Sector Allocation & Evolution %

	Fund	Index
Basic Materials	3.56	4.50
Communication Services	0.00	8.30
Consumer Cyclical	18.15	15.22
Consumer Defensive	0.70	5.09
Energy	1.42	0.86
Financial Services	26.29	15.17
Healthcare	0.00	8.15
Industrials	38.92	23.09
Real Estate	9.43	3.11
Technology	0.42	15.48
Utilities	1.11	1.04

Time Period: 01/08/2019 to 31/07/2024



## Portfolio Weight %

Equity Exposure	100.10
Hedge Exposure	0.00
Cash Exposure	-0.10
Top 10	52.45
Number of Holdings #	34

## Market Cap Allocation %

	Fund	Index
Giant Cap	36.32	52.73
Large Cap	38.52	39.53
Mid Cap	21.47	7.74
Small Cap	3.68	0.00
Micro Cap	0.00	0.00

## Style Allocation %

	Fund	Index
Large Value	31.37	24.24
Large Core	41.78	34.14
Large Growth	1.69	33.88
Mid Value	4.14	1.96
Mid Core	11.71	3.64
Mid Growth	5.62	2.14
Small Value	1.73	0.00
Small Core	0.00	0.00
Small Growth	1.96	0.00

Market Cap breakdown is based on a stocks position in the cumulative capitalisation of its style zone. Giant = the top 40%; Large = the next 30%; Mid = the next 20%; Small = the next 7%, Micro = the remaining 3%.

Overweightings and Underweightings information is provided with reference to a Morningstar Index which closely aligns to the Fund's Benchmark and is for illustrative purposes only.

## Citywire Rating



Citywire Rating: The rating is based on the Fund Manager's three-year risk-adjusted performance for the period 30/06/2021 - 30/06/2024.

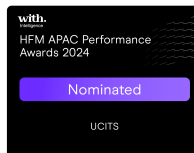


Citywire has awarded Eric Sturdza Investments a Bronze rating in the Equity - Japan sector for the period 31/12/2016 - 31/12/2023.

## Fund Awards



with Intelligence  
HFM Asian  
Performance  
Awards 2023  
UCITS category



with Intelligence  
HFM APAC  
Performance  
Awards 2024  
Nomination  
UCITS category



LSE Lipper Fund Awards, ©2024 LSEG. All rights reserved. Used under licence. The Nippon Growth (UCITS) Fund has been recognised by Lipper for its 3 year performance in Europe and other regions. For further information, contact [info@ericsturdza.com](mailto:info@ericsturdza.com)

Source: Eric Sturdza Investments. Allocation data is provided by Morningstar Direct for illustration purposes and is subject to change. Any reference to a specific company or security does not constitute a recommendation to buy, sell, hold or directly invest in the company or securities. The assets in the allocation may not be available in your country of residence, please check with your investment adviser. Please refer to the glossary at [ericsturdza.com/glossary](http://ericsturdza.com/glossary) for further explanation on specific terminologies.



## ESG Pillar Score

### B JPY Class



### Morningstar Index



ESG Pillar Scores are an objective way to assess the components of a portfolio's ESG risk through the traditional ESG thematic framework. ESG risk pillars and their contributions to the Portfolio Sustainability Score allows for comparison of the thematic risk drivers, as well as a deeper understanding of the ESG risk composition of portfolios. The pillar scores are calculated as an asset-weighted average of the corresponding company-level risk scores from Sustainalytics.

The Pillar Scores represent the amount of risk in the Portfolio's sustainability score attributed to each component (i.e. E, S or G). Unallocated: Unmanaged risk for companies with an ESG Risk rating which hasn't been broken out by Environmental, Social or Governance components.

ESG information is provided with reference to a Morningstar Index which closely aligns to the Fund's Benchmark and is for illustrative purposes only.

## Sustainability Score

### Corporate Sustainability Score

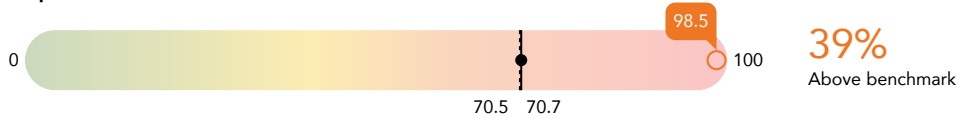


The Morningstar Portfolio Corporate Sustainability Score is an asset-weighted average of Sustainalytics' company-level ESG Risk Score. The Sustainalytics' company-level ESG Risk Score measures the degree to which a company's economic value may be at risk driven by ESG factors. Like the ESG Risk Scores, the Portfolio Corporate Sustainability Score is rendered on a 0-100 scale, where lower scores are better, using an asset-weighted average of all covered securities. Morningstar determines whether each eligible portfolio holding can be classified under the corporate or sovereign framework. Each holding can only contribute an ESG Risk Score or a Country Risk score, not both. To receive a Corporate Sustainability Score, at least 67% of a portfolio's corporate assets under management (long positions only) must have a company ESG Risk Rating.

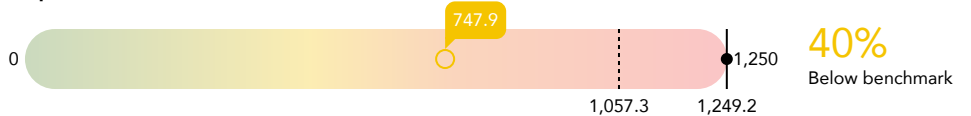
## Carbon Intensity

Scope 1+2/Scope 1+2+3 is the asset-weighted average for the portfolio of the underlying holdings' Carbon Intensity scope 1, 2 and 3 (in USD terms). The average only includes holdings for which company Carbon Intensity Scope 1, 2 and 3 (in USD terms) is available. Carbon intensity for a company represents the volume of carbon emissions per million dollars of revenue, computed as follows: Total Emissions Scope 1, 2 and 3 (metric tons of CO<sub>2</sub>) / Revenue (Mil USD). For a portfolio, carbon intensity represents the average carbon efficiency of its investments, in metric tons of CO<sub>2</sub>. A lower value indicates lower intensity, and greater carbon efficiency.

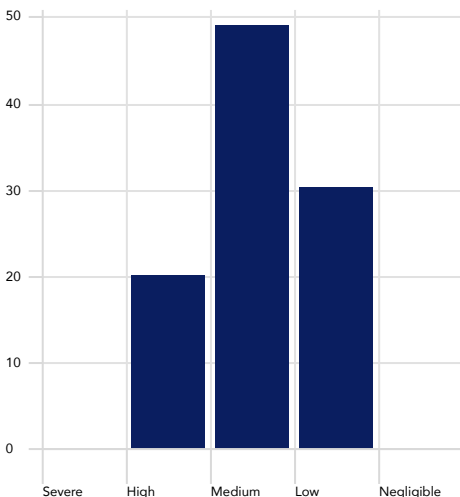
### Scope 1+2



### Scope 1+2+3



## Corporate ESG Risk Distribution



The AUM distribution of corporate holdings by ESG Risk Classification as per Sustainalytics classification methodology.

## Morningstar Sustainability Rating



The Fund has achieved a Morningstar Sustainability rating of **3**, as at 31/05/2024 based on 100.00 AUM coverage and out of 1,189 funds in the EAA Fund Japan Large-Cap Equity category. Sustainalytics provides company-level analysis used in the calculation of Morningstar's Historical Sustainability Score. Data is based on long positions only.

## Carbon Risk

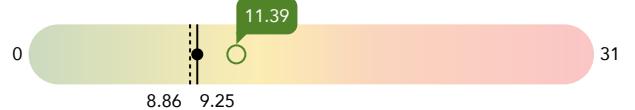
Portfolio Date: 31/05/2024

Carbon Risk Percentage of Eligible Portfolio Covered: 100.00%

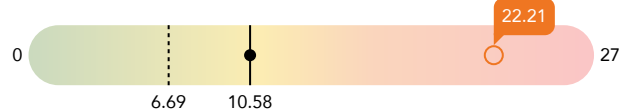
### No Designation

Morningstar carbon metrics are asset-weighted portfolio calculations based on Sustainalytics' company Carbon Risk Rating. To receive the Morningstar® Low Carbon Designation™, a fund must have a 12-month average Portfolio Carbon Risk Score below 10 and a 12-month average Fossil Fuel Involvement of less than 7% of assets. This signal helps investors easily identify funds that are well-positioned to transition to a low-carbon economy.

### Historical Carbon Risk Score



### Historical Fossil Fuel Involvement





## Fund Share Classes, Assets Under Management (AUM) & NAV

Share Class	ISIN	Inception Date	NAV (Mo-End)	Morningstar Rating Overall	2024-07
A CHF Class	IE00BGHQ9L68	08/04/2022	1,821.14 CHF	—	A CHF Class 1,592,277 CHF
A EUR Class	IE00B991XL80	14/05/2013	1,854.79 €	—	A EUR Class 1,358,704 €
A JPY Class	IE00B563Q870	04/11/2009	¥ 221,476.93	★★★★	A JPY Class ¥ 3,515,592,554
B EUR Class	IE00B95WDX70	28/03/2013	3,468.24 €	—	B EUR Class 10,114,746 €
B JPY Class	IE00B97RRK58	21/05/2013	¥ 95,052.59	★★★★	B JPY Class ¥ 14,924,733,332
B USD Class	IE00BGHQ9Q14	04/09/2023	\$ 1,316.18	—	B USD Class \$ 7,428,373
M JPY Class	IE00B45CFP81	22/10/2009	¥ 265,167.87	★★★★	M JPY Class ¥ 388,905,544
<b>Fund AUM</b>					<b>¥ 24,475,496,565</b>

Share Class	ISIN	Min. Investment	Management Fee	Performance Fee	PRIIPS Ongoing Costs	Distribution Status	Currency Hedged
A CHF Class	IE00BGHQ9L68	0 CHF	1.50%	15.00%	1.80	Acc	Yes
A EUR Class	IE00B991XL80	0 €	1.50%	15.00%	1.80	Acc	Yes
A JPY Class	IE00B563Q870	¥ 0	1.50%	15.00%	1.80	Acc	No
B EUR Class	IE00B95WDX70	1,000,000 €	1.00%	10.00%	1.30	Acc	Yes
B JPY Class	IE00B97RRK58	¥ 100,000,000	1.00%	10.00%	1.30	Acc	No
B USD Class	IE00BGHQ9Q14	\$ 1,000,000	1.00%	10.00%	1.30	Acc	Yes
M JPY Class	IE00B45CFP81	¥ 0	1.50%	12.50%	1.80	Acc	No

The charges you pay are used to pay the costs of running the fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment. **Please note:** Performance fees are charged at the rates outlined above, based on relative outperformance, if any, of the Net Asset Value per Share (before deducting the amount of any accrued liability for a performance fee) over the Benchmark.

## Portfolio Manager



Yutaka Uda



Maiko Uda

Yutaka Uda is the Founder, CIO and President of Tokyo-based Evarich Asset Management. Uda-San was previously Managing Director and CIO of Nikko Asset Management and also enjoyed 15 years managing funds for Baring Asset Management in London and Tokyo. He began as an analyst at Nikko securities in 1971 after graduating from Tokyo University. The Fund is co-managed by Maiko Uda.

Further details regarding the team, their respective experience and responsibilities towards the Fund can be viewed at [ericsturdza.com](http://ericsturdza.com).

## Key Facts & Terms

<b>Fund Name</b>	Nippon Growth (UCITS) Fund, a sub-fund of E.I. Sturdza Funds plc	<b>Domicile</b>	Ireland
<b>Structure</b>	UCITS V Compliant	<b>Regulator</b>	Central Bank of Ireland
<b>Fund Life</b>	Unlimited	<b>Investment Manager &amp; Global Distributor</b>	E.I. Sturdza Strategic Management Limited
<b>Recommended Holding Period</b>	Appropriate for medium to long term investors	<b>Management Company</b>	Opportunity Fund Management
<b>Liquidity</b>	Daily	<b>Investment Adviser</b>	Evarich Asset Management
<b>Notification</b>	Two business days	<b>Administrator</b>	Caceis Ireland Limited
<b>Base Currency</b>	JPY	<b>Depository</b>	Caceis Bank, Ireland Branch
<b>Available Currency Classes</b>	JPY, EUR, USD, GBP, CHF	<b>SFDR Classification</b>	Article 8



## Registrations, Market Definition, Local Agents & Representatives

The Fund is currently registered for sale in the following countries:

### Austria (P)

Erste Bank de oesterreichischen Sparkassen AG - Paying Information Agent.

### Finland (P)

FE fundinfo, Luxembourg Branch - Paying & Information Agent.

### France (P)

CACEIS Bank France SA – Centralising Agent.

### Germany (P)

FE fundinfo, Luxembourg Branch – Paying & Information Agent.  
(Publication of NAV: fundinfo.com).

### Italy \*

FE fundinfo, Luxembourg Branch – Paying & Information Agent.  
(Publication of NAV: fundinfo.com).

### Luxembourg (P)

FE fundinfo, Luxembourg Branch - Paying & Representative Agent.

### Netherlands (P)

FE fundinfo, Luxembourg Branch - Paying & Information Agent.

### Norway (P)

FE fundinfo, Luxembourg Branch - Paying & Information Agent.

### Singapore (Q)

The Fund is registered in Singapore as a **restricted foreign scheme** within the meaning of the Sixth Schedule to the Securities and Futures Act (Offers of Investments) (Collective Investment Schemes) Regulations of Singapore, this document is exclusively intended for (i) institutional investors pursuant to Section 304 of the Securities and Futures Act ("SFA"), Chapter 289, (ii) "relevant persons" pursuant to Section 305(1) of the SFA, (iii) persons pursuant to Section 305(2) of the SFA or (iv) pursuant to other provisions of the SFA applicable by virtue of exemptions. **This document may not be transmitted or distributed, directly or indirectly, to retail investors in Singapore.** The Fund is not authorised under Section 286 of the SFA or treated as a recognised scheme under Section 287 of the SFA by the Monetary Authority of Singapore ("MAS"). The shares are not allowed to be offered to the retail public in Singapore. **WARNING: This document must be read in conjunction with the Information Memorandum, which has not been registered as a Prospectus with the Monetary Authority of Singapore ("MAS").**

### Spain (P)

FE fundinfo, Luxembourg Branch - Paying & Information Agent.  
CNMV number: 1269.

### Sweden (P)

FE fundinfo, Luxembourg Branch - Paying Agent.

### Switzerland (P)

Registered with FINMA for public distribution to Swiss non-qualified investors. The Swiss Rep is CACEIS (Switzerland) SA and Paying Agent is CACEIS Bank, Montrouge, Nyon Branch / Switzerland, 35 route de Signy, CH 1260 Nyon. Copies of the Swiss Prospectus, KIDs, articles of association, annual and semi-annual reports can be obtained free of charge from the Swiss Rep or at ericsturdza.com. Publication of NAV: fundinfo.com.

### United Kingdom (P)

The Fund is a Recognised fund in the United Kingdom under the Financial Services and Markets Act 2000. This document is a financial promotion and has been approved for the purposes of Section 21 of the Financial Services and Markets Act 2000, by E.I. Sturdza Strategic Management Limited, which is an Authorised Schedule 5 entity. UK regulation for the protection of retail clients in the UK and the compensation available under the UK Financial Services Compensation scheme does not apply in respect of any investment or services provided by an overseas person. FE Fundinfo (UK) Ltd – Facilities Agent.

### Investor Type Definitions

**P** = Public distribution to all investor types.

**Q** = Qualified investor distribution / Professional / Institutional investors only.

**EU** = Professional and Retail investors as per MiFID.

**\*Italy:** Share classes can be registered either on an institutional basis or a retail basis in Italy. Generally all Share Classes are registered on an institutional basis, with the exception of the professional and 'C' designated share class which are registered for sale to the public.

**Switzerland:** Swiss Qualified investors and Swiss non-qualified investors.

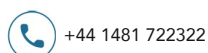
**United Kingdom:** Professional investors and Retail investors.

**Singapore:** Qualified investors. Restricted scheme (this is part of the Information Memorandum).

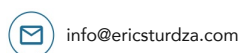
## For Further Information

For further information regarding the E.I. Sturdza Funds plc - Nippon Growth (UCITS) Fund please contact:

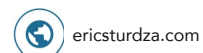
Adam Turberville, Director



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## Executive Summary

E.I. Sturdza Strategic Management Limited (“Eric Sturdza Investments”) is a boutique fund management business with a proven track record of offering high conviction, award-winning strategies to institutional and private clients globally.

We are part of the Eric Sturdza Group, with the backing of Banque Eric Sturdza S.A. and the Sturdza family which has provided significant benefits since our inception, to us and our partners, most notably providing stability, even through challenging market conditions.

Eric Sturdza Investments is the Investment Manager and Global Distributor for the E.I. Sturdza Funds plc.

We strive to work with specialist dedicated investment advisory firms or teams that we believe are amongst the best in their field to offer investors access to class leading investment products supported by institutional quality risk management frameworks and controls which are independent from the portfolio management teams. Further information can be obtained at [ericsturdza.com](http://ericsturdza.com).

In our view responsible investment is best embodied by the [UN-supported Principles for Responsible Investment](#) (PRI). To confirm our approach to responsible investing, we are a signatory to the PRI. Learn more about [Our ESG Approach](#) at [ericsturdza.com/about-us/environmental-social-governance-esg/](http://ericsturdza.com/about-us/environmental-social-governance-esg/).

We are also a proud member of [The Institutional Investors Group on Climate Change](#) (IIGCC). The IIGCC is a leading global investor membership body and the largest one focusing specifically on climate change.

Signatory of:



## Our Vision, Mission & Values

### Vision

Our vision and aspiration is to become a leading asset management company, with a distinctive brand and reputation for exceptional services at all levels.

We aim to align our capabilities with the needs of investors today and in the future, providing access to our best investment ideas, within a framework that seeks to achieve better environmental, societal and governance outcomes.

### Mission

Our overarching mission is to deliver long term performance and value to our clients, recognising that “value” today encapsulates more than pure economic returns. As such our aspiration as an Asset Manager is to establish products that provide varying value profiles, from those driven by economic returns, to more risk or factor orientated capabilities.

### Values

We believe managing wealth is not a business, it is a profession. We grow as the reward for a craft that we perform with integrity, expertise and passion. Accordingly, we believe that it is essential that we meet the highest ethical and professional standards in all we do.

We are mindful of the global issues that we face today and our obligation to take whatever action we can to address these. As an Asset Manager we believe we have the opportunity to actively contribute through the investment decisions we make, allocating money to those companies that are able to demonstrate strong environmental, social and governance (ESG) credentials, or those that are actively transitioning their business to ensure ESG considerations are fully integrated within their investment processes. This belief resonates through our Company and we continue on a journey to ensure that such considerations and aspirations are reflected in all our activities and relationships. We also look at the way we can directly support projects that seek to address such considerations, this takes various forms and includes amongst others; clean water, education and reforestation projects.

We recognize the value of our team, fundamentally believing that our collective success is driven primarily by the people we work with, hence our focus of identifying exceptional talent at all levels.



**IMPORTANT: For Professional investors only and for Swiss Qualified investors. Investment involves risk. The value of investments, the funds and the income which may be generated from them can go down as well as up and therefore investors must be able to bear the risks of a substantial impairment or loss of their entire investments. Past performance may not be a reliable guide to future performance. Returns could be reduced, or losses incurred, due to currency fluctuations.**

This marketing communication relates to the **E.I. Sturdza Funds plc - Nippon Growth (UCITS) Fund**, an open-ended umbrella investment company with variable capital and segregated liability between Funds incorporated with limited liability in Ireland under the Companies Act 2014 with registration number 461518 and established as an undertaking for collective investment in transferable securities (UCITS) pursuant to the European Directive no 2009/65/EC as amended (the "UCITS directive"). A decision may be taken at any time to terminate the arrangements made for the marketing of the Fund in any EEA Member State in which it is currently marketed. In such circumstances, Shareholders in the affected EEA Member State will be notified of this decision and will be provided with the opportunity to redeem their shareholding in the Fund free of any charges or deductions for at least 30 working days from the date of such notification.

This document is issued by Opportunity Fund Management (Eric Sturdza Group) ("OFM"), a regulated Management Company / AIFM approved by the Commission de Surveillance du Secteur Financier under registration ID S00001025 and appointed by the Fund, registered for distribution in the countries mentioned in this document. OFM's registered office address is 16, rue Robert Stumper, L-2557 Luxembourg. OFM has appointed E.I. Sturdza Strategic Management Limited ("EISSML"), as investment manager and global distributor which is regulated by the Guernsey Financial Services Commission and registered under Company Number 35985. EISSML's registered office address is 3rd Floor, Maison Trinity, Rue du Pre, St Peter Port, Guernsey GY1 1LT. EISSML is part of the Eric Sturdza Group. The information contained herein is estimated, unaudited and may be subject to change.

This document is not intended for U.S. Persons pursuant to Regulation S of the Securities and Exchange Commission under the U.S. Securities Act of 1933, as amended (sec.gov). The Fund presented in this document is not registered under United States federal securities laws or any other applicable law in the states, territories and possessions of the United States of America. Consequently, it cannot be marketed directly or indirectly in the United States (including its territories and possessions or areas subject to its jurisdiction) and to or for the benefit of U.S. Persons.

This document is for information purposes only and does not constitute a recommendation to buy, sell or otherwise apply for shares in the Fund and any of the sub-funds, nor does it constitute investment, legal or tax advice. The information contained in this document reflects the opinion of E.I. Sturdza Strategic Management Limited and may change without notice.

The Fund is subject to tax laws and regulations of Ireland. Depending on your home country of residence, this might have an impact on your investment. In general, the tax treatment depends on the individual circumstances of each potential investor and may be subject to change in the future. E.I. Sturdza Strategic Management Limited has not considered the suitability of investment against your individual needs and risk tolerance. Any potential investor should assess the suitability of this investment solution to his/her risk profile. Investment in the Fund is suitable only for those persons and institutions for whom such investment does not represent a complete investment program, who understand the degree of risk involved (as detailed under the section headed "Risk Factors" in the Prospectus and Supplement), can tolerate a high level of volatility and believe that the investment is suitable based on the investment objectives and financial needs. Please consult your financial and tax adviser.

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