

STONEHAGE FLEMING POOLED INVESTMENTS (IRELAND) PLC
(the Company)

SECOND ADDENDUM DATED 14 December, 2021
(the Addendum)

This Addendum forms part of and should be read in the context of and in conjunction with the prospectus for the Company dated 8 October, 2020, the supplements for Stonehage Fleming Global Best Ideas Equity Fund and Stonehage Fleming Global Multi-Asset Portfolio dated 8 October, 2020 and the Supplement for Stonehage Global Sustainable Equity Fund dated 5 January, 2021 (the Supplements) as amended by way of a first addendum dated 9 March, 2021 (together referred to as the Prospectus). All capitalised terms herein contained shall have the same meaning in this Addendum as in the Prospectus unless otherwise indicated. All information contained in the Prospectus and Supplement is deemed to be incorporated herein.

The directors of the Company (the **Directors**) accept responsibility for the information contained in this Addendum. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in the Prospectus and this Addendum is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

Prospective investors should not construe the contents of this document as legal, investment, tax or other advice. Each prospective investor must rely upon his or her own representatives, including his or her own legal counsel and accountants, as to legal, economic, tax and related aspects of the investment described herein and as to its suitability for such investor.

The Directors wish to advise Shareholders and prospective investors of the following amendments to the Prospectus:

1. AMENDMENTS TO THE PROSPECTUS IN RESPECT OF THE COMPANY

- (i) The insertion of the following definition in the section of the Prospectus entitled “DEFINITIONS”:

“Taxonomy Regulation” Regulation (EU) 2020/852 Of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088”

2. AMENDMENTS TO THE SUPPLEMENT IN RESPECT OF THE STONEHAGE FLEMING GLOBAL BEST IDEAS EQUITY FUND

- (i) The deletion in its entirety of wording set out under the section entitled “Sustainability” and its replacement with the following wording:

“The Fund has been classified by the Manager, working in conjunction with the Investment Manager, as a product in accordance with Article 6 of SFDR and does not follow a dedicated ESG investment strategy and sustainability is not the stated objective of the Fund. In particular, the underlying investments of the Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The investment decisions made by the Fund do not take into account the EU criteria for environmentally sustainable economic activities. The investment decisions made by the Fund do, however, take into consideration some environmentally sustainable factors.”

3. AMENDMENTS TO THE SUPPLEMENT IN RESPECT OF THE STONEHAGE FLEMING GLOBAL SUSTAINABLE EQUITY FUND

- (i) The insertion of the following wording at the end of the section entitled “Sustainability”:

“In implementing the investment strategy of the Fund, the Investment Manager selects investments which it believes contribute to the environmental objectives of climate change mitigation and climate change adaptation.

In assessing whether an investment is considered to be in environmentally sustainable economic activities¹, the Manager and/or the Investment Manager must quantify and be satisfied that the relevant economic activity (i) contributes substantially to the environmental objectives of climate change mitigation and climate change adaptation; (ii) does not significantly harm any of the environmental objectives outlined in the Taxonomy Regulation; (iii) is carried out in compliance with the minimum safeguards laid down in the Taxonomy Regulation and (iv) comply, as of the date of this document, with the latest versions of technical screening criteria that have been published by the European Commission in respect of climate change mitigation and climate change adaptation.

Due to lack of availability of reliable, timely and verifiable data which is not yet publicly reported by issuers or investee companies as well as the delay in the publication of Commission Delegated Regulation 2021/2139 which sets down applicable technical screening criteria, both of which are required in order to assess the extent to which the Fund is invested in environmentally sustainable economic activities under the EU Taxonomy framework, the Manager, working in conjunction with the Investment Manager, has been unable to assess with certainty whether or not the investments underlying the Fund are in environmentally sustainable economic activities. Because of this, the Manager and/or the Investment Manager cannot currently provide an accurate commitment as to the proportion of investments of the Fund in environmentally

¹ Please note that Article 5 of the Taxonomy Regulation references “environmentally sustainable economic activities” and as a result this is the wording used in this disclosure. It is worth noting that under the finalised draft Level 2 measures published by the ESAs (applicable from 1 January, 2023), they use the term “Taxonomy-aligned economic activity” instead of “environmentally sustainable economic activities”.

sustainable economic activities. Accordingly, as at the date of this document, the minimum evidenceable percentage of investments of the Fund in environmentally sustainable economic activities aligned with the EU Taxonomy (including in transitional and enabling activities) shall be 0% of the net assets of the Fund. The Manager, in consultation with the Investment Manager, has determined to include the 0% taxonomy aligned disclosure on the basis that it is understood to be emerging as a common approach at industry level in respect of the Taxonomy Regulation disclosure requirements where a reliable and verifiable alignment is not currently possible and until such stage as formal guidelines are issued to the industry in respect of such disclosures.

This will be kept under active review and once sufficient reliable, timely and verifiable data from issuers or investee companies becomes available and can be assessed against the applicable technical screening criteria set down in Commission Delegated Regulation 2021/2139, the Supplement shall be revised to provide an indication of the proportion of investments of the Fund which are in environmentally sustainable economic activities under the EU Taxonomy framework.”

Dated: 14 December, 2021