

**First Sentier Investors Global
Umbrella Fund**

an umbrella fund with segregated
liability between sub-funds

70 Sir John Rogerson's Quay,
Dublin 2, D02 R296, Ireland

Tel: +353 (0) 1 669 4868

www.firstsentierinvestors.com

This document is important and requires your immediate attention. If you are in any doubt as to the action you should take, you should seek advice from your investment consultant, tax adviser and/or legal adviser as appropriate.

If you have sold or transferred all of your Shares in the Stewart Investors Worldwide Leaders Sustainability Fund* (*This is not classified as a green or ESG fund in Hong Kong*) (the "Fund"), a sub-fund of the First Sentier Investors Global Umbrella Fund plc (the "Company"), please pass this letter to the purchaser or transferee or to the stockbroker, bank or other agent through whom the sale or transfer was effected for transmission to the purchaser or transferee as soon as possible.

Unless otherwise defined, capitalised terms used herein shall bear the same meaning as capitalised terms used in the prospectus for the Company dated 9 March 2021 (the "Prospectus"), the Supplement for Hong Kong Investors to the Prospectus dated 9 March 2021, and the product key facts statement of the Fund dated March 2021 ("KFS") (collectively, the "Hong Kong Offering Documents").

The Directors accept responsibility for the accuracy of the information contained in this document. To the best of the Directors' knowledge and belief the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of such information.

25 November 2021

To: the Shareholders of the Fund

Dear Shareholder,

Notification of the Re-classification of the Fund as an ESG Fund in Hong Kong

We refer to the notice to Shareholders dated 23 December 2019, in which we informed the then Shareholders of the Fund that the Fund was not classified as a green or ESG fund in Hong Kong pursuant to the SFC's "Circular to management companies of SFC authorised unit trusts and mutual funds – Green or ESG funds" dated 11 April 2019.

We are writing to you as an investor of the Fund to inform you that the Fund will be re-classified as an ESG fund in Hong Kong with effect from 9 December 2021 (the "**Effective Date**").

* The Fund is not classified as a green or ESG fund in Hong Kong pursuant to the SFC's Circular to management companies of SFC-authorized unit trusts and mutual funds on Green or ESG funds dated 11 April 2019 as may be amended from time to time.

The decision to re-classify the Fund as an ESG fund in Hong Kong is made to more accurately reflect the Fund's position as a sustainable fund in light of the latest development in the regulations with respect to ESG funds globally including Hong Kong, which does not result in any material change to the investment policy, the operation and management, the investment universe, or the risk profile¹ of the Fund. There will be no change to the fee level/cost in managing the Fund. There will not be any material impact on or prejudice to Shareholders of the Fund as a result of the re-classification of the Fund in Hong Kong. The costs and expenses that will be incurred in connection with the re-classification of the Fund will be approximately HK\$150,000 (amounting to approximately 0.04% of the Net Asset Value of the Fund) which will be borne by the Fund.

Please refer to Annex I to this notice, in which you may find the draft revised investment policy in the KFS of the Fund, marked-up against the existing wording, to reflect the re-classification of the Fund as an ESG fund in Hong Kong (together with other enhancement and/or clarification of disclosures) for your reference.

Shareholders who do not agree with the above change may voluntarily redeem their Shares on any Dealing Day until 5 p.m. Hong Kong time (being the dealing cut-off time) or such other dealing cut-off time as the intermediaries may impose ("**Cut-Off Time**") on the last Dealing Day prior to the Effective Date, which is expected to be 8 December 2021 ("**Last Dealing Day**") in accordance with the terms of the Hong Kong Offering Documents. There are currently no redemption fees levied on the redemption of Shares in the Fund.

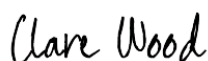
Please note that although we will not impose any redemption fees in respect of your redemption instructions, your bank, distributor, or financial adviser may charge you redemption and/or transaction fees. You are advised to contact your bank, distributor or financial adviser should you have any questions.

The Hong Kong Offering Documents will be updated in due course to reflect the re-classification of the Fund as an ESG fund in Hong Kong. A copy of the revised Hong Kong Offering Documents will be available on or around the Effective Date upon request free of charge during normal business hours from the registered office of the Hong Kong Representative (address as set out below).

If you have any questions about the contents of this letter please contact your investment advisor/consultant or your relationship manager at the Investment Manager or First Sentier Investor's Client Services Team or Asia Client Services Team of the Hong Kong Representative as set out below.

by telephone: the Hong Kong Representative's Asia Client Services Hotline on +852 2846 7566 (telephone calls may be recorded for your security);
by email: infohk@firstsentier.com; or
in writing: Hong Kong Representative, First Sentier Investors (Hong Kong) Limited, 25th Floor, One Exchange Square, 8 Connaught Place, Central, Hong Kong.

Yours sincerely,



On behalf of the Board of Directors
First Sentier Investors Global Umbrella Fund plc

¹ The disclosures in the Hong Kong Offering Documents will be enhanced to reflect the risks associated with the sustainability investment strategy which is currently adopted by the Fund. Please refer to Annex II to the Notice for the wordings of the relevant risk disclosures.

Annex I

Objectives and Investment Strategy of the Fund

The investment objective of the Fund is to achieve long term capital appreciation.

The Fund invests primarily (at least 70% of its Net Asset Value) in a diverse portfolio of equity securities or equity-related securities of larger capitalisation companies which are listed, traded or dealt in on any of the regulated markets worldwide. Larger capitalisation companies are currently defined for the purposes of this policy as companies with a minimum investible market cap (free float) of US\$3 billion at the time of investment. The Investment Manager may review this definition as considered appropriate. Equity-related securities include warrants, preference shares, rights issues, convertible bonds, depository receipts such as American Depositary Receipts and Global Depositary Receipts, equity linked or participation notes etc. that are listed, traded or dealt on regulated markets. The Fund may not invest more than 15% of its Net Asset Value in aggregate in warrants or equity linked or participation notes.

In relation to the term Leaders, this indicates the Fund will not invest in securities of small capitalisation companies. Small capitalisation companies are currently defined for the purposes of this policy as companies with a minimum investible market cap (free float) of less than US\$1 billion at the time of investment.

The Fund seeks to achieve long-term capital appreciation by making investments that contribute to positive social and environmental sustainability outcomes. The Fund invests primarily (at least 70% of its Net Asset Value) in companies that are positioned to benefit from, and contribute to, ~~the~~ sustainable development ~~of the countries in which they operate~~. All existing and future investments by the Fund are and will be sustainable investments, which mean investments in an economic activity that contributes to either a social and/or environmental principal objective, with the exception of cash and holdings of cash proxy instruments, which are considered to be sustainability-neutral.

The hallmarks and binding elements of the investment strategy are an exclusive focus on companies that contribute to and benefit from sustainable development; a research-driven, fundamental, bottom-up approach to the selection and ongoing analysis of investments; a focus on the quality and sustainability attributes of every company; a focus on company stewardship and sound governance; a long-term investment horizon; and a commitment to engagement in order to address sustainability concerns and issues.

Sustainable development is based on the Investment Manager's own philosophy explained in the paragraph below.

The Investment Manager's investment strategy is founded on the principle of stewardship, allocating capital to high quality companies with sound growth prospects and strong management teams. The Investment Manager believes that sustainability is a driver of investment returns and that incorporating these considerations fully into the investment process is the best way to protect and grow capital for clients over the long-term (at least five years). The Investment Manager takes a bottom-up, qualitative approach (i.e. focusing on analysing individual companies rather than countries or sectors) to finding and investing in reasonably priced, high quality companies that are well positioned to benefit from and contribute to, and benefit from, sustainable development ~~in the countries in which they operate~~. The Investment Manager has a strong conviction that such companies face fewer risks and are better placed to deliver positive long-term, risk-adjusted returns (i.e. investment returns which take into account the associated risk taken in making the particular investment; higher short-term returns may often reflect higher risk). An output of the Fund's bottom-up investment process, means that it does not seek to and actively avoids investing in companies with material exposure to what the Investment Manager believes, in its discretion, to be harmful products and services described in section 4.2 of Appendix 9 of the Prospectus. The Investment Manager invests with capital preservation in mind, meaning it defines risk as losing client money, rather than deviation from a benchmark index. The Investment Manager's focus on quality companies rather than investing according to a benchmark index may lag in very strong liquidity-driven or momentum-led markets and may perform well when due recognition is given to companies with quality management teams, good long-term growth prospects and sound balance sheets.

The Investment Manager assesses the overall quality of a target company by understanding:

- i. the quality of management which includes integrity, attitude to environmental and social impacts, corporate governance, long-term performance, attitude to risk and alignment with minority shareholders. The Investment Manager has a preference for stable, long-term (often multiple generational) stewards leading the company;
- ii. the quality of the franchise which includes the social usefulness of the products or services, their environmental impacts and efficiency, and responsible business practices; and
- iii. the quality of the financials which includes financial performance over the economic cycle, cash flows and debt, with a preference for net cash balance sheets (i.e. companies whose cash resources exceed their debt).

Sustainability is also a key part of the Investment Manager's engagement approach with topics ranging from labour [rights](#) to pollution. The Investment Manager believes that its role as a long-term investor and fiduciary of client capital is to provide the space for management teams to address sustainability issues which the wider capital markets may at times overlook. The Investment Manager does this through constructive, non-confrontational and relationship-based conversations with the companies held for clients.

~~While certain of the criteria listed above (including, for example, environmental and social impacts) may be viewed as ESG-related, the Investment Manager believes that sustainable development is a broad concept involving considerations which may, or may not, be ESG-related. The Fund's overall strategy should therefore not be considered as an ESG strategy.~~

The Fund is not subject to any limitation on the portion of its Net Asset Value that may be invested in any one or more emerging markets or any sector.

Although the Fund has a global investment universe, the securities selected for investment based on the Investment Manager's approach may at times result in a portfolio that is concentrated in certain geographical area(s).

The Fund's maximum exposure to China A Shares including those listed on ~~the Small and Medium Enterprise Board~~, the ChiNext Board and/or the Science and Technology Innovation Board ([the "STAR board"](#)) (whether directly through the QFII/RQFII, the Stock Connects, and/or indirectly through equity linked or participation notes and collective investment schemes) will not exceed 50% of the Fund's Net Asset Value.

The Fund's maximum exposure to China B Shares (through direct investment) will not exceed 10% of the Fund's Net Asset Value.

The Fund may only use financial derivative instruments ("FDIs") for purposes of hedging and efficient portfolio management. ~~The Fund will not invest extensively or primarily in FDIs to achieve its investment objective.~~ It is not intended that the Fund will avail of the opportunity to invest in FDIs for investment purposes.

The Fund may invest cash balances in short-term securities listed, traded or dealt in on a regulated market. For defensive purposes [where necessary to protect investor value](#) during periods of perceived uncertainty and volatility (e.g. market crash or major financial crisis), the Fund may also hold all or part of its assets in debt securities, asset-backed and mortgage-backed securities which must be rated at least investment grade or in the opinion of the [Investment Manager or Sub-Investment Manager](#) to be of comparable quality and which are listed, traded or dealt in on a regulated market. It is currently intended that the Fund's investment in asset-backed securities and/or mortgage-backed securities (if any) will be less than 30% of its Net Asset Value.

[More product-specific information can be found on the website www.firstsentier.com](http://www.firstsentier.com) (This website has not been reviewed by the SFC).

Benchmark information:

The Fund is actively managed meaning that the Investment Manager uses its expertise to pick investments rather than tracking the allocation and therefore the performance of the benchmark. The Fund's performance is compared against the value of the following benchmark: MSCI AC World Index. Please refer to the Fund's investment policy in the Prospectus for details of the benchmark information.

Annex II

Risks associated with the Sustainability Investment Strategy of the Fund

The Fund is subject to the following risks as a result of the sustainability investment strategy of the Fund:

- *Subjective judgment in investment selection:* In pursuing the sustainable investment objective of the Fund, the Investment Manager integrates certain sustainability criteria into the Fund's investment selection process. Such assessment by the Investment Manager is subjective in nature and therefore it is possible that the Investment Manager may not apply the relevant sustainable investment criteria correctly which may lead to the Fund foregoing investment opportunities or investing in securities which do not meet the relevant sustainability criteria.
- *Reliance on third party sources:* When assessing the sustainable investment based on the Fund's sustainability criteria, the Investment Manager is dependent upon information and data from investee companies and/or third party data providers. Such information or data may be incomplete, inaccurate, inconsistent or unavailable in a timely manner. As a result, there is a risk of incorrectly assessing a security or issuer or there is a risk that the Fund could have exposure to issuers who do not meet the relevant sustainability criteria.
- *Lack of global standardisation regarding what activities qualify as sustainable:* The lack of a global standardised system regarding what activities qualify as sustainable may affect the Investment Manager's ability to measure and assess the sustainability outcomes of a potential investment.
- *Concentration in investments with sustainability focus:* The Fund focuses on sustainable investments which may reduce risk diversifications. Consequently, the Fund may be particularly dependent on the development of these investments. As such, the Fund may be more susceptible to fluctuations in value resulting from the impact of adverse conditions on these investments. This may have an adverse impact on the performance of the Fund and consequently adversely affect an investor's investment in the Fund.