

This Prospectus is an extract of the Prospectus of the Company dated 20 March 2024. It is only intended for the offer of Shares in Switzerland and does not constitute a Prospectus for the purposes of Irish applicable law.

The Directors of the Company, whose names appear in the **Management and Administration** section herein, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

Edition for Switzerland dated 30 May 2024

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Wellington Management Funds (Ireland) plc (the "Company") is an investment company with variable capital and segregated liability between sub-funds (the "Funds") incorporated on 25 June 1997 and is authorised in Ireland as a UCITS pursuant to the Regulations. Such authorisation is not an endorsement or guarantee of the Company or any Fund by the Central Bank, nor is the Central Bank responsible for the contents of this Prospectus.

The authorisation of the Company by the Central Bank shall not constitute a warranty as to the performance of the Company and the Central Bank shall not be liable for the performance or default of the Company.

**The value of and income from the Shares in the Company may go up or down and you may not get back the amount you have invested in the Company. Fees and expenses charged to a Fund will also negatively affect that Fund's investment return, and you should refer to the Charges and Expenses section below. Where a subscription and/or redemption charge is provided for the difference at any one time between the preliminary and repurchase price of Shares in the relevant Fund of the Company means that the investment should be viewed as medium to long term. As described in the section entitled Distribution Policy distributions may be paid out of capital, for example where the Directors do not wish them to be paid out of profits or other sources. In this instance the capital of the relevant Fund will be eroded, the distribution is achieved by foregoing the potential for future capital growth and the cycle may continue until all capital is depleted. Distributions out of capital may have different tax implications to distributions out of income and you should seek advice in this regard. Before investing in the Company, you should consider the risks involved in such investment. Please see relevant Risk Factors below.**

If you are in any doubt about the contents of this Prospectus you should consult your Stockbroker, Bank Manager, Solicitor, Accountant or other financial adviser.

Potential subscribers and purchasers of Shares should inform themselves as to (a) the possible tax consequences, (b) the legal requirements, (c) any foreign exchange restrictions or exchange control requirements and (d) any other requisite governmental or other consents or formalities which they might encounter under the laws of the countries of their incorporation, citizenship, residence or domicile and which might be relevant to the subscription, purchase, holding or disposal of Shares.

Any information given or representations made, by any dealer, salesman or other person not contained in this Prospectus, a Key Investor Document or in any reports and accounts of the Company forming part hereof must be regarded as unauthorised and accordingly must not be relied upon. Neither the delivery of this Prospectus or a Key Investor Document nor the offer, issue or sale of Shares shall under any circumstances constitute a representation that the information contained in this Prospectus is correct as of any time subsequent to the date of this Prospectus. To reflect material changes, this Prospectus may from time to time be updated and intending subscribers should enquire of the Management Company as to the issue of any later Prospectus or as to the issue of any reports and accounts of the Company.

This Prospectus may not be used for the purpose of an offer or solicitation in any jurisdiction or in any circumstances in which such offer or solicitation is unlawful or not authorised. In particular: the Shares have not been registered under the United States Securities Act of 1933 (as amended) and may not, unless otherwise permitted by the Company in its sole discretion, be directly or indirectly offered or sold in the United States or to any United States Person. The Company will not be registered under the United States Investment Company Act of 1940 (as amended).

The Articles of Association of the Company give powers to the Directors to impose restrictions on the holding of Shares by (and consequently to redeem Shares held by), or the transfer of Shares to, United States Persons or by any person who appears to be in breach of the laws or requirements of any country or government authority or by any person or persons in circumstances (whether directly or indirectly affecting such person or persons, and whether taken alone or in conjunction with any other persons, connected or not, or any other circumstances appearing to the Directors to be relevant) which, in the opinion of the Directors, might result in the Company a particular sub-fund or particular Share Class incurring any liability to taxation or suffering legal, pecuniary, reputational, regulatory or material administrative disadvantages which the Company, the relevant sub-fund or the relevant Share Class might not otherwise have incurred or suffered including where the Company suspects market timing or by any person who holds less than the Minimum Shareholding, or no longer meets the eligibility criteria, for the relevant Share Class. The Articles of Association also permit the Directors where necessary to repurchase and cancel Shares held by a person who is or is deemed to be or is acting on behalf of a Taxable Irish Person on the occurrence of a chargeable event for taxation purposes.

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**DIRECTORY**

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COMPANY**

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Dublin 1  
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**IRISH LEGAL ADVISERS TO THE  
COMPANY**

A&L Goodbody LLP  
3 Dublin Landings  
North Wall Quay  
Dublin 1  
Ireland



## **THE COMPANY**

The Company is an open-ended investment company with variable capital and segregated liability between Funds incorporated with registered number 267944 and is authorised in Ireland as a UCITS pursuant to the Regulations.

The Company is structured as an umbrella fund. Each Class of Shares issued relates to a particular Fund the assets of which will be invested in accordance with the investment objective applicable to such Fund. A separate pool of assets shall not be maintained for each Class of Shares within the same Fund.

The creation of further Share Classes must be notified to, and cleared in advance with the Central Bank. On the introduction of any new Class of Shares, the Company will prepare and the Directors will issue documentation setting out the relevant details of each such Class of Shares.

The names of all Funds approved at the date of this Prospectus are listed in the Global Supplement.

### **Profile of a typical investor**

All of the Funds are suitable for investors seeking long-term total return.

All of the Funds are suitable for investors who are prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time and each Fund is suitable as an investment in a well-diversified portfolio. The Supplement for each Fund contains further information on the investors for whom the Fund is suitable.

## **INVESTMENT OBJECTIVES AND POLICIES OF THE FUNDS**

Details of the investment objective and policies for each Fund of the Company are set forth in the Supplement for that Fund. Any change in the investment objective or a material change in investment policy of a Fund may only be made with the approval on the basis of a majority of votes cast at general meeting of the Shareholders of the relevant Fund. In the event of a change of investment objective or policy of a Fund a reasonable notification period will be provided by that Fund to enable Shareholders to redeem their Shares prior to the implementation of the changes.

Details of the investment restrictions laid down in accordance with the Regulations are set out in Appendix II. Such restrictions apply to each Fund and apply at the time of purchase or entry into each relevant transaction. The Directors may from time to time impose such further investment restrictions on any Fund as shall be compatible with or in the interests of Shareholders, in order to comply with the laws and regulations of the countries where Shareholders of the Company are located.

Where a Fund utilises financial derivative instruments, further detail in relation to the relevant financial derivatives instrument and the potential effect of such financial derivatives instrument is set out in the section entitled **Types and Description of FDI**s and in the Supplement for that Fund.

Information on other assets that the Funds may invest in can be found in the sections entitled **All Funds** and **Risk Factors** and in the Supplement for each Fund.

From time to time, the Funds which seek exposure to fixed income securities may be exposed to the performance of Transferable Securities and Money Market Instruments issued or guaranteed by an EU Member State, its local authorities, non-EU Member States or public international bodies of which one or more EU Member States are members (an "Issuer"). In such instances, the relevant Fund may have an exposure of in excess of 35% of its Net Asset Value to the Transferable Securities or Money Market Instruments of a single Issuer. In all instances, the diversification requirements applicable to such instruments shall be adhered to.

## **ALL FUNDS**

### **Benchmark Regulations**

The Benchmark Regulations entered into force in June 2016 and became fully applicable in the EU on 1 January 2018 (save that certain provisions, including those related to 'critical benchmarks', took effect as at 30 June 2016), subject to certain transitional provisions. The Benchmark Regulations apply to 'contributors' to, 'administrators' of, and 'users' of benchmarks in the EU. They, among other things, (a) require EU benchmark administrators to be authorised or registered and to comply with requirements relating to the administration of benchmarks, (b) prohibit the use in the EU of benchmarks provided by EU administrators which are not authorised or registered in accordance with the Benchmark Regulations, and (c) prohibit the use in the EU of benchmarks provided by non-EU administrators which are not (i) authorised or registered and subject to supervision in a jurisdiction in respect of which an 'equivalence' decision has been adopted in accordance with the Benchmark Regulations, or (ii) where such equivalence decision is pending, 'recognised' by the competent authorities of the applicable EU Member State(s). An exception to this is that a benchmark provided by a non-EU administrator can itself be endorsed for use in the EU by an EU authorised or registered administrator or an EU-based supervised entity, following authorisation of the endorsement by the relevant competent authority.

As required by the Benchmark Regulations the Company maintains a contingency plan setting out the actions that it would take in the event that a benchmark (as defined by the Benchmark Regulations) materially changes or ceases to be provided.

The Company is required under the Benchmark Regulations to use only benchmarks which are provided by authorised benchmark administrators that are present in the register of administrators maintained by the European Securities and Markets Authority, pursuant to Article 36 of the Benchmark Regulations.

## **Borrowing and Lending Powers**

The Company may borrow up to 10% of a Fund's Net Asset Value at any time for the account of such Fund and may charge the assets of such Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Company to invest in Transferable Securities, the Company may not lend to, or act as guarantor on behalf of, third parties. A Fund may acquire debt securities and securities which are not fully paid.

## **Cash and Cash Equivalents**

Each Fund may also hold cash and cash equivalents for investment purposes or as ancillary liquid assets. Cash equivalents include bank deposits and fixed or floating rate instruments, including but not limited to commercial paper, floating rate notes, certificates of deposit, freely transferable promissory notes, debentures, asset backed securities and government or corporate bonds. All such investments shall generally be of investment grade or, if unrated, be deemed to be of investment grade by the Investment Manager and may be denominated in any currency. Each Fund holds cash balances with the Depositary, however on a daily basis any US Dollar balances greater than 10% of the Net Asset Value of a Fund are generally placed overnight in Securities Financing Transactions ("SFTs") (such as reverse-repurchase transactions) to ensure that counterparty exposure is managed within the limits set out in Appendix II. The expected maximum exposure to SFTs is stated in each individual Fund Supplement.

## **Credit Rating**

The Investment Manager will under no circumstances rely exclusively or automatically on external ratings in determining the credit risk of a financial instrument, and in addition the Investment Manager will perform its own credit assessment with respect to each investment.

## **Hedged Share Class Transactions**

A Fund may invest in securities denominated both in its Base Currency and other currencies and may establish Classes in currencies other than the Base Currency of a Fund. Currency may be hedged on an opportunistic basis. Hedged Share Classes may be created for the purpose of (i) effecting currency hedging at the Share Class level or; (ii) hedging the denomination of the assets of a Fund; for other arrangements considered on a case-by-case basis by the Central Bank.

Hedged Share Classes may be created subject to the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time, which, in accordance with the investment style of the Fund, may include hedging (i) the Dealing Currency against the Base Currency of the Fund; (ii) the Dealing Currency against the other currencies in which the assets of the relevant Fund may be denominated (based on either actual exposure or benchmark weights). There can be no assurance that the hedging strategy chosen by the Investment Manager will be successful. Details of the hedging types used are included in the Supplement for each Fund.

Where the Company creates Hedged Share Classes for the purpose of effecting currency hedging at the Share Class level, over-hedged or under-hedged positions may occur due to factors outside the control of the Fund. Over-hedged positions will not exceed 105% of the Net Asset Value of each Hedged Share Class, under-hedged positions will not fall short of 95% of the portion of the Net Asset Value of each Hedged Share Class which is to be hedged and hedged positions will be kept under review to ensure that positions do not exceed permitted levels and to ensure that positions materially in excess of 100%

of the Net Asset Value of the relevant Hedged Share Class will not be carried forward from month to month.

To the extent that currency hedging is successful for a particular Hedged Share Class, the performance of the Hedged Share Class is likely to move in line with the performance of the underlying assets.

Hedged Share Classes seek to offer a return reflecting the performance outcome of the Base Currency Share Class; however, Shareholders should be aware of situations where this may not be achieved due to the following factors:

- A difference in interest rates between the currency pair for Share Class hedging: this deviation may be positive or negative, depending on prevailing rates;
- Performance dilution from unrealised profit and loss: the fact that all unrealised profit/loss on the currency forward remains uninvested until the hedge is rolled over can have the effect on the Hedged Share Class of being temporarily over or underinvested in the base investment portfolio;
- Transaction costs which will negatively impact the Share Class performance;
- Intra-day volatility of the value of the Base Currency assets in relation to the existing hedge, as market value hedge adjustments can only be placed after the Fund's valuation point;
- The hedge may not always be placed at 100% to avoid transaction costs for minor adjustments.

#### **Other Share Class Transactions**

Currency hedging transactions will also be executed at Share Class level for the SC and TC Share Classes. These transactions will hedge the Dealing Currency against the Base Currency as described above. However the objective of these transactions, in combination with the currency derivatives put in place by the Investment Manager within the portfolio itself, is to ensure that the Shareholders in the SC or TC Share Classes, being the non-USD Share classes, have substantially the same currency exposures as the Shareholders in the SB or TB Share Classes respectively, being the USD Share Classes, and therefore receive similar investment returns. The investment returns will differ to the extent of the costs of these currency hedging transactions at Share Class level and also the difference in interest rates between the Dealing Currency and the Base Currency which may have a positive or negative impact on returns.

These Share Class currency hedging transactions will comply with the requirements of the Central Bank (including the limits regarding over-hedging described in the **Hedged Share Class Transactions** section above). The class level transactions will be clearly attributable to the relevant SC or TC Share Class and gains, losses and costs of the relevant transactions will accrue solely to the relevant Share Class. SC or TC Share Classes will only be created where the Investment Manager believes that they will not prejudice the interests of the holders of other Share Classes. Furthermore, the derivative transactions to which the Share Class relates will not result in a leveraged return per Share Class.

There can be no assurance that the above strategy will be successful.

Hedged Share Classes may be made available which aim to provide investors with currency exposure to a currency without using a Hedged Share Class denominated in such currency (due, for example, to currency trading restrictions on such currency). Such Hedged Share Classes will be denominated in the Base Currency of the relevant Fund and the currency exposure to the other currency will be sought by converting the Net Asset Value of the Hedged Share Class into the different currency using FDI. The Net Asset Value of such Hedged Share Class will remain denominated in the Base Currency, however due to the additional FDI exposure, such Net Asset Value is expected to fluctuate in line with the

fluctuation of the exchange rate between the other currency and the Base Currency. This fluctuation will be reflected in the performance of the relevant Hedged Share Class and therefore the performance of such Hedged Share Class may differ significantly from the performance of the other Share Classes in the Fund. Details of any such Hedged Share Classes will be set out in the relevant Supplement.

These Share Class currency hedging transactions will comply with the requirements of the Central Bank (including the limits regarding over-hedging described in the **Hedged Share Class Transactions** section above). The class level transactions will be clearly attributable to the relevant Share Class and gains, losses and costs of the relevant transactions will accrue solely to the relevant Hedged Share Class.

### **Securities Financing Transactions Regulation**

The Company is subject to the provisions of the European Regulation on Reporting and Transparency of Securities Financing Transactions (the “SFTR”). The SFTR sets out certain disclosure requirements regarding the use of SFTs and total return swaps, as set out below.

The types of SFTs the Funds may use consist of repurchase or reverse-repurchase transactions, and securities lending transactions. The Funds may use these SFTs for efficient portfolio management purpose and may use total return swaps for efficient portfolio management purposes and/or investment purposes in accordance with the Funds’ investment objective and policy and within the limits set out in the Supplement for each Fund. Further details in relation to cash and cash equivalents and SFTs are set out in the **Cash and Cash Equivalents** section in this Prospectus.

Subject to the limitations referred to in the Supplement for each Fund and in the section titled **Borrowing and Lending Powers**, any assets of a Fund may be the subject of such SFTs and total return swaps. SFTs will only be entered into with counterparties meeting the requirements as set out in the Regulations and other than the requirements of the Regulations, there are no pre-specified restrictions on the legal status, country of origin or minimum credit rating of any counterparty in such transactions. The current maximum and expected proportion of each Fund’s assets which may be subject to total return swaps or SFTs, expressed as the gross sum of notionals as a percentage of the Net Asset Value, is set out in the relevant Supplement. None of the Funds currently enter into securities lending transactions.

The types of acceptable collateral received by the Funds in respect of SFTs, total return swaps and other FDIs, as well as the diversification requirements, valuation requirements and limitations on reuse of collateral, are explained below under the heading **Collateral**.

The section of this Prospectus entitled **Risk Factors** provides a description of the risks associated with the use of SFTs, total return swaps and other FDIs.

The treatment of costs related to the SFTs the Funds may use is as set out in the section below titled **Securities Lending and Other Transactions**. In respect of total return swaps, all of the revenues arising from total return swaps, net of direct and indirect financing costs, will be retained by the relevant Fund.

The Company will disclose in its annual report certain information regarding its use of SFTs.

### **Financial Derivative Instruments (FDIs)**

The investment policy of a Fund may state that it can invest “indirectly” in various asset classes. This means that, subject to the specific investment policies and restrictions for a Fund, the Company, on behalf of a Fund, may enter into FDIs transactions to gain exposure to those asset classes and may also

hold outright short positions synthetically through the use of FDIs for investment and efficient portfolio management purposes. A Fund may be leveraged through the use of FDIs.

The risk management techniques used by the Investment Manager to assess market risk and to seek to ensure that their use of FDIs is within regulatory limits are set out in the Supplement for each Fund.

### **Types and Description of FDIs**

Below are examples of some of the types of FDIs that the Funds may enter into from time to time:

**Options.** Subject to the requirements laid down by the Central Bank, each Fund may purchase or sell options contracts (including currency, interest rate, bond, equity, index, inflation, futures, swap options, options on UCITS eligible exchange traded commodities and notes and commodity indices and contingent options, whose payoff depends on the performance of two different assets). A call option on a security is a contract under which the purchaser, in return for a premium paid, has the right to buy the securities underlying the option at the specified exercise price at any time during the term of the option. The writer (seller) of the call option, who receives the premium, has the obligation, upon exercise of the option, to deliver the underlying securities against payment of the exercise price. A put option is a contract that gives the purchaser, in return for a premium paid, the right to sell the underlying securities at the specified exercise price during the term of the option. The writer of the put, who receives the premium, has the obligation to buy the underlying securities, upon exercise, at the exercise price. A swap option is an option to enter into an interest rate swap.

Each Fund may also enter into options traded over-the-counter (or OTC options). Unlike exchange traded options, which are standardised with respect to the underlying instrument, expiration date, contract size, and strike price, the terms of OTC options are generally established through negotiation with the other party to the option contract. While this type of arrangement allows a Fund great flexibility to tailor the option to its needs, OTC options generally involve greater risk than exchange-traded options, which are guaranteed by clearing organisations of the exchanges where they are traded.

**Futures.** Subject to the requirements laid down by the Central Bank, each Fund may also enter into certain types of futures contracts (including interest rate, index (including credit index), bond and currency futures). The sale of a futures contract creates an obligation by the seller to deliver the type of financial instrument called for in the contract in a specified delivery month for a stated price. The purchase of a futures contract creates an obligation by the purchaser to pay for and take delivery of the type of financial instrument called for in the contract in a specified delivery month, at a stated price. A contract for difference is an arrangement made in a futures contract whereby differences in settlement are made through cash payments, rather than the delivery of physical securities. The purchase or sale of a futures contract differs from the purchase or sale of a security or option in that no price or premium is paid or received. Instead, an amount of cash, U.S. Government Securities or other liquid assets must be deposited with the broker. This amount is known as initial margin. Subsequent payments to and from the broker, known as variation margin, are made on a daily basis as the price of the underlying futures contract fluctuates making the long and short positions in the futures contract more or less valuable, a process known as “marking to market.” In most cases futures contracts are closed out before the Settlement Date without the making or taking of delivery. Closing out a futures contract sale is effected by purchasing a futures contract for the same aggregate amount of the specific type of financial instrument or commodity and the same delivery date. If the price of the initial sale of the futures contract exceeds the price of the offsetting purchase, the seller is paid the difference and realises a gain. Conversely, if the price of the offsetting purchase exceeds the price of the initial sale, the seller realises a loss. Similarly, the closing out of a futures contract purchase is effected by the purchaser entering into

a futures contract sale. If the offsetting sale price exceeds the purchase price, the purchaser realises a gain, and if the purchase price exceeds the offsetting sale price, a loss will be realised.

**Swaps.** Subject to the requirements laid down by the Central Bank, each Fund may enter into transactions in swaps or options on swaps (including credit default swaps, interest rate swaps, total return swaps, inflation swaps, currency swaps, equity swaps, swaps on an index, contracts for difference and swaps on UCITS eligible exchange traded commodities and notes and commodities indices). The purchase of a cap entitles the purchaser, to the extent that a specified index exceeds a predetermined value, to receive payments on a notional principal amount from the party selling the cap. The purchase of a floor entitles the purchaser, to the extent that a specified index falls below a predetermined value, to receive payments on a notional principal amount from the party selling the floor. A collar combines elements of buying a cap and selling a floor. A total return swap is a bilateral financial contract, which allows a Fund to enjoy all of the cash flow benefits of an asset without actually owning this asset (the Reference Asset). A Fund will have to pay a periodic fee (fixed or floating payment) in exchange for its right to receive the total return of the Reference Asset (coupons or capital gains or losses). The Reference Asset can be almost any asset, index or basket of assets, which constitute an eligible investment for a Fund.

A Fund may enter into credit default swap agreements. A Fund may be either the buyer or seller in a credit default swap transaction. The “buyer” in a credit default contract is obligated to pay the “seller” a periodic stream of payments over the term of the contract provided that no event of default on an underlying reference obligation has occurred. If a Fund is a buyer and no event of default occurs, the Fund will lose its investment and recover nothing. On the other hand, if the Fund is a buyer and an event of default does occur, the Fund (the buyer) will receive the full notional value of the reference obligation that may have little or no value. Conversely, if the Fund is a seller and an event of default occurs, the Fund (the seller) must pay the buyer the full notional value, or “par value”, of the reference obligation in exchange for the reference obligation. As a seller, a Fund receives a fixed rate of income throughout the term of the contract, which typically is between six months and three years, provided that there is no default event. If an event of default occurs, the seller must pay the buyer the full notional value of the reference obligation. A credit-linked note is a security that is structured by embedding a credit default swap agreement in a funded asset to form an investment that has credit risk and cash flow characteristics resembling a bond or a loan. An inflation swap transfers inflation risk from one party to another through an exchange of cash flows. An interest rate swap involves the exchange by a Fund with another party of their respective commitments to pay or receive cash flows (e.g., an exchange of floating rate payments for fixed-rate payments). A contract for difference (“CFD”) is an arrangement made between two parties to exchange the difference between the opening and closing prices of specified financial instruments. The differences in settlement are made through cash payments, rather than the delivery of physical securities. Purchases of CFDs may be used to gain exposure to a wide range of assets and indices. Leverage is created as the payment of a low margin or premium can provide a Fund with a large exposure relative to its outlay and a small change in the price of the underlying security can produce a disproportionately larger profit or loss. CFDs are usually traded OTC and carry counterparty risk.

Swap agreements, including caps, floors and collars, can be individually negotiated and structured to include exposure to a variety of different types of investments or market factors. Depending on their structure, swap agreements may increase or decrease the overall volatility of a Fund's investments and its share price and yield because, and to the extent, these agreements affect the Fund's exposure to long- or short-term interest rates, foreign currency values, mortgage-backed securities values, corporate borrowing rates or other factors such as security prices or inflation rates. Swap agreements will tend to shift a Fund's investment exposure from one type of investment to another. For example, if a Fund agrees to exchange payments in US Dollars for payments in the currency of another country, the swap

agreement would tend to decrease the Fund's exposure to U.S. interest rates and increase its exposure to the other country's currency and interest rates. Caps and floors have an effect similar to buying or writing options.

**Forward Contracts.** A forward currency exchange contract or a bond forward, which involves an obligation to purchase or sell a specific currency or bond at a future date at a price set at the time of the contract, reduces a Fund's exposure to changes in the value of the currency or bond it will deliver and increases its exposure to changes in the value of the currency or bond it will receive for the duration of the contract. Such forwards may also be non-deliverable and structured so as to be cash settled, usually on a thinly traded currency or bond or non-convertible currency.

A Fund may enter into these contracts to hedge against exchange risk, to increase exposure to a currency or bond or to shift exposure to currency fluctuations from one currency to another.

Each Fund may buy and sell currencies on a spot and forward basis, subject to the limits and restrictions adopted by the Central Bank from time to time to reduce the risks of adverse changes in exchange rates, as well as to enhance the return of a Fund by gaining an exposure to a particular foreign currency. The effect on the value of a Fund is similar to selling securities denominated in one currency and purchasing securities denominated in another currency. Suitable hedging transactions may not be available in all circumstances and there can be no assurance that a Fund will engage in such transactions at any given time or from time to time. Also, such transactions may not be successful and may eliminate any chance for a Fund to benefit from favourable fluctuations in relevant foreign currencies. A Fund may use one currency (or a basket of currencies) to hedge against adverse changes in the value of another currency (or a basket of currencies) when exchange rates between the two currencies are positively correlated.

Bond forwards are used in the same manner as interest rate futures in markets or where futures contracts are not available or lack suitable liquidity. Bond forwards have the same duration risk as the bond as it is simply a forward settlement of a purchase or sale.

A contract to sell currency or a bond would limit any potential gain, which might be realised if the value of the hedged currency or bond increases.

Forward rate agreements are over the counter contracts used to limit or manage exposure to an interest rate at a future start date for a determined amount and maturity. These contracts carry a single payment based on the difference between the agreed interest rate and the market rate prevailing at that future date.

**To-be-Announced Securities.** A "to-be-announced" ("TBA") security is structured so that the actual security that will be delivered to fulfil a TBA trade is not designated at the time the trade is made. The securities are "to be announced" prior to the actual trade settlement date. To that extent they are deemed to have a forward element.

**Warrants.** A warrant is a contract which gives the contract holder the right, but not the obligation, to exercise a feature of the warrant, such as buying a specified quantity of a particular product, asset or financial instrument, on, or up to and including, a future date (the exercise date). Another feature of a warrant may be to enhance the return of a sovereign debt security according to a specific trigger such as country GDP. The 'writer' (seller) has the obligation to honour the specified feature of the contract. Warrants have similar characteristics to call options, but are typically issued together with preferred stocks or bonds or in connection with corporate actions and are usually of little value. Warrants are longer-dated options and are generally traded over the counter. The commercial purpose of warrants



can be to hedge against the movements of a particular market or financial instrument, including futures, or to gain exposure to a particular market or financial instrument instead of using a physical security.

**Convertible Securities.** These include bonds or other convertible securities that can be converted into a predetermined amount of shares of common stock in the issuing company at certain times during its life, usually at the discretion of the bond holder or on the occurrence of a specific event. A convertible security may be viewed as a security with an embedded option to exchange the security for equity. A Fund may receive convertible securities from time to time through corporate actions.

**Structured Notes.** In order to gain access to certain markets where direct investment may not be possible, a Fund may invest in securities issued by a financial institution or special purpose entity, the performance of which depends on the performance of a corresponding asset. Typically the redemptions or repayment proceeds from the Structured Notes replicate the underlying asset. However, such Structured Notes may embed a derivative which has the effect of adjusting the proceeds received. As a result, the note's coupon, average life, and/or redemption values can become exposed to the forward movement in various indices, equity prices, foreign exchange rates or mortgage backed security prepayment speeds.

The Management Company employs a risk-management process which enables it to accurately measure, monitor and manage at any time the risk of each Fund's financial derivatives positions and their contribution to the overall risk profile of the Fund. Market risk and leverage is measured using an advanced risk management method in accordance with the Central Bank's UCITS Regulations. Counterparty risk exposure to any OTC derivative transactions should not exceed the limits permitted under the Central Bank's UCITS Regulations. Before investing in any financial derivative instruments on behalf of a Fund, the Company must file a risk management process statement with the Central Bank and in accordance with particular requirements of the Central Bank and shall specify, for that purpose, the types of derivative instruments, the underlying risks, the quantitative limits and the methods which are chosen in order to estimate the risks associated with transactions in any derivative instruments applicable to a Fund.

Use of techniques and instruments which relate to Transferable Securities and Money Market Instruments and which are used for the purposes of efficient portfolio management shall be understood as a reference to techniques and instruments which fulfil the following criteria:

- (i) they are economically appropriate in that they are realised in a cost effective way;
- (ii) they are entered into for one or more of the following specific aims:
  - (a) the reduction of risk;
  - (b) the reduction of cost; or
  - (c) the generation of additional capital or income for the Fund with a level of risk which is consistent with the risk profile of the Fund and the risk diversification rules set out in the Central Bank's UCITS Regulations.
- (iii) their risks are adequately captured in the risk management process; or
- (iv) they cannot result in a change to the Fund's declared investment objective or add substantial supplementary risks in comparison to the general risk policy as described in its sales documents.

The Management Company will, on request, provide supplementary information to Shareholders relating to the risk management methods employed, including the quantitative limits that are applied and any recent developments in the risk and yield characteristics of the main categories of investments.

FDIs used for efficient portfolio management must also comply with the Central Bank's UCITS Regulations. Any FDIs not included in the risk management process will not be utilised by a Fund until such time as a revision of the risk management process is provided to the Central Bank for review.

**Global Depositary Notes.** A global depositary note is a debt instrument issued by a depositary bank, which gives the holder beneficial ownership of a specific underlying local security but which trades, settles, and pays interest and principal in US dollars. Global depositary notes expand the universe of emerging market debt securities available to investors wishing to invest in emerging market debt instruments where such local currency debt instruments may be unavailable to offshore investors. Global depositary notes may be settled via Euroclear, Clearstream or DTC.

### **Leverage**

Funds using a value at risk ("VaR") approach to calculate their global exposure also disclose the expected range of their levels of leverage. This range is an indicative range and not a regulatory limit. A Fund's level of leverage may exceed the top end of the range from time to time as long as the Fund remains within its risk profile and complies with the applicable VaR limit. The actual level of leverage over the previous financial year for any Fund is disclosed in the annual report of the Funds.

Leverage is a measure of FDIs usage and the reinvestment of collateral in relation to efficient portfolio management transactions. It is calculated as the sum of notional amounts of all FDIs contracts entered into by the Fund expressed as a percentage of the Fund's Net Asset Value and any additional leverage generated by the reinvestment of collateral in relation to efficient portfolio management transactions.

The leverage calculation methodology neither distinguishes between FDIs used for investment or hedging purposes such that strategies aiming to reduce risk will contribute to an increased level of leverage for the Fund; nor does the methodology allow netting of FDIs positions such that FDIs roll-overs and combinations of long-short positions contribute to a significant increase in the level of leverage even though they do not increase or only cause a moderate increase in risk to the Fund; and nor does the methodology take into account the underlying assets' volatility or draw a distinction between long-dated and short-dated assets such that a Fund that has a high level of leverage may not necessarily be riskier than a Fund that has a lower level of leverage. The Supplement for each Fund provides for a maximum figure in respect of such leverage. That maximum figure includes 300% percentage for Share Class related hedging. Whilst these percentage amounts are included at a Fund level such higher rates of leverage will generally only concern holders of currency Hedged Share Classes, as well as investors in the SC and TC Share Classes.

### **Master Limited Partnerships**

A Fund may invest in Master Limited Partnerships that are eligible for investment by the Fund. Master Limited Partnerships are limited partnerships that will be listed/traded on the exchanges and markets listed in Appendix I to the Prospectus. As a result they offer the day to day tradability of common stock. They engage in certain businesses, mostly pertaining to the use of natural resources, such as petroleum and natural gas extraction and transportation. They combine the tax advantages of a partnership and higher dividend yields with the day to day tradability of common stock. The limited partners are responsible for paying taxes on their individual portfolios of the Partnership's income

(even if the Partnership does not pay a cash distribution), gains, losses and deductions. They issue distributions that will form part of the Net Asset Value of the Fund. These may be classified as a return of the capital of the Partnership which may have the effect of reducing the value of Fund's investment in the Partnership. They consist of a general partner who manages the operations and limited partners who own the units of the Partnership and contribute capital to the Partnership.

### **Investment in Other Investment Funds**

Each Fund may invest in investment funds managed or sponsored by the Investment Manager or its affiliates, which meet the conditions laid down by the Central Bank, and which have investment objectives consistent with the relevant Fund's investment objective, provided, where a Fund invests in other investment funds managed or sponsored by the Investment Manager or its affiliates, that there is no duplication of investment management fees due to such investments.

### **Private Placements**

Each Fund may hold private placements of freely Transferable Securities and restricted or unregistered freely Transferable Securities, the liquidity of which is deemed by the Investment Manager to be appropriate.

### **Transferable Securities and Money Market Instruments**

Transferable securities and money market instruments in which a Fund will invest will (save for permitted unlisted investments) be either admitted to official listing on a stock exchange or dealt on a market listed in Appendix I.

### **Exclusions**

Ireland ratified the Oslo Treaty on Cluster Bombs through the Cluster Munitions and Anti-Personnel Mines Act (the "Act") of 3 December 2008. The Act does not cover private investments but expressly prohibits direct and indirect investment of public moneys in companies in the manufacture of prohibited munitions or the components thereof. Accordingly the Company prohibits all Funds from investing in such companies.

Certain of the Funds have adopted the Company's exclusion policy which sets out issuers or groups of issues which may be excluded from a Fund, either in full or with exceptions (the "Exclusion Policy"). Where a Fund is applying the Exclusion Policy and whether or not this is in full or with exceptions, this will be disclosed in the relevant Fund's Supplement.

The Company's Exclusion Policy prohibits investment in the securities of issuers (subject to the exceptions as described in the paragraph entitled **General Information about Exclusions** below) that have been identified, using a combination of third party and/or internal Wellington Management analysis, as being involved in the following areas:

- Production of controversial weapons, including cluster munitions, landmines, biological / chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
- Production of nuclear weapons;
- Production, distribution, retail or supply of tobacco related products;
- Thermal coal extraction or thermal coal-based power generation; and
- Production and generation of oil sands (also known as tar sands).

Full details of the thresholds for involvement are available at [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr) and free of charge on request from your Wellington Management contact.

The exclusion list may be amended from time to time at the Investment Manager's discretion and such amendments may be implemented without notification to Shareholders.

#### *Enhanced Exclusions*

In addition to applying the exclusions required by the Company's Exclusion Policy, certain Funds apply a further enhanced set of exclusions to screen out certain securities prior to investment. Where a Fund is applying an enhanced set of these additional exclusions this will be disclosed in the relevant Fund's Supplement. These enhanced exclusions will vary from Fund to Fund and will be identified using a combination of third party and/or internal Wellington Management analysis.

For any Fund that has applied enhanced exclusions, the list of screens applied for that Fund and the third-party provider(s) used to identify relevant issuers for exclusion can be found at <https://sites.wellington.com/KIIDS/>. The above list is available free of charge on request from your Wellington Management contact. Exclusion lists may be amended from time to time at the Investment Manager's discretion and such amendments may be implemented without notification to Shareholders.

#### *General Information about Exclusions*

Where exclusions are applied, they will apply to any investments in the equity or debt securities of an issuer. A Fund may gain indirect exposure (through, including but not limited to, derivatives, indices and shares or units of collective investment schemes) to issuers that are excluded. Further Funds are also permitted to short excluded issuers (meaning the Fund would benefit if the excluded issuer's price goes down). A Fund may also gain exposure to an excluded issuer through use-of-proceeds bonds (e.g. 'green' bonds, 'social' bonds, or 'sustainability' bonds) where proceeds from these bonds are intended to be ringfenced to fund projects with specific environmental or social benefits, and which are otherwise in line with the relevant Fund's Investment Objective and Policy.

Wellington Management may be reliant on both internal and external research and data as well as fundamental analysis, where applicable. As a result, such reliance gives rise to the risks that are described in the Model and Data Reliability Risk paragraph of the Risk Factors section. Decisions around the application of an exclusion policy can also involve a degree of judgement, whether at external data vendors or internally within Wellington Management's framework governing the exclusions list, which can impact the list of issuers excluded. In addition, changes or updates to the available information on any given issuer may not result in an immediate change to the impacted issuer's status with respect to excluded categories. Where existing research changes or new information comes to light which may materially impact an individual issuer's status, Wellington Management will seek to review such status in light of the new or updated information in a reasonable timeframe and in accordance with the process established for review of the relevant exclusion category.

#### **Sustainability Risk Disclosures**

Pursuant to SFDR, the Company is required to disclose the manner in which Sustainability Risks (as defined in the Definitions section and further described in the Risk Factors section) are integrated into investment decisions and also the results of the assessment of the likely impacts of Sustainability Risks on the returns of each of the Funds.

The extent to which Sustainability Risks represent potential or actual material risks to a Fund is considered by the Investment Manager in its investment decision making and risk monitoring. Along with any other material risk, the Investment Manager will consider Sustainability Risks in order to seek to maximize long-term risk-adjusted returns for the relevant Fund. Further information on how Sustainability Risks are integrated into the investment decision-making for a specific Fund is set out in the Supplement for that Fund.

The impacts following the occurrence of a Sustainability Risk may be numerous and may vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there could be a negative impact on, or entire loss of, its value.

In the event that a Sustainability Risk arises this may cause investors, (including the Investment Manager) to determine that a particular investment is no longer suitable and to sell it (or not make an investment in it), further exacerbating the downward pressure on the value of the investment. The Investment Manager may also decide to engage with the relevant issuer in relation to the issuer's management of a Sustainability Risk. For example, if an Investment Manager considers that an issuer's management of transition risks arising from climate change (as described more fully in the Sustainability Risks paragraph within the Risk Factors section of this Prospectus) is important for the long term value of the issuer, then provided that such engagement is consistent with the investment objectives and policies of the relevant Fund, the Investment Manager may decide to engage with an issuer to encourage the issuer to adopt a net zero 2050 policy within their business strategy in order to better manage their climate change transition risk.

Assessment of the likely impacts of Sustainability Risks on the returns of a Fund is conducted at the portfolio level. Further details on the impacts of Sustainability Risks on the returns of the Funds can be found in the Sustainability Risk paragraph within the Risk Factors section of this Prospectus and also in the Supplement for the relevant Fund.

For more information on how Sustainability Risks are assessed in relation to the Funds please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).

### **Sustainable Investments**

Certain Funds which either have sustainable investment as an investment objective or promote, amongst other characteristics, environmental or social characteristics, might have an investment policy of investing some or all of their assets into Sustainable Investments.

The Company defines Sustainable Investments as an investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

Individual Funds may evaluate the classification of investment holdings as Sustainable Investments using differing methodologies and subjective analyses with respect to the level of contribution to environmental or social objectives, the assessment of potential harm to any environmental or social

objectives caused or the good governance practices of an individual investment. As a result, the assessment of any given holding as a “Sustainable Investment” may vary from one Fund to the next and individual Funds may reach different conclusions about the total number of Sustainable Investments in the portfolio. For more information on an individual Fund’s methodologies for assessing Sustainable Investments, please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr) and refer to the relevant Fund Supplement.

The Investment Manager assesses whether or not such investment do significant harm by reference to the United Nations Global Compact, as well as a combination of third party and/or internal Wellington Management analysis where appropriate. For more information on Wellington Management Group's Global Governance Assessment Policy, which sets out the framework for evaluating the governance practices of the companies in which it invests, including additional information about available research, please see the following [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).

### **ESG Ratings Framework**

Funds may use Wellington Management’s internal environmental, social and governance ratings (the “ESG Ratings”) and may choose to rely on an individual environmental or social rating (respectively, “E Rating” or “S Rating”). ESG Ratings aim to combine environmental indicators (such as energy efficiency, carbon emissions and pollutants, sustainable packaging and hazardous waste), social indicators (such as corruption and bribery, labour relations, product safety and supply chain management) and governance indicators (such as board diversity, executive compensation, ownership structure and shareholders’ rights) into a single data point which can be used in the assessment of the environmental, social and governance activities and attributes of corporate issuers.

Ratings may be created using both third party and internal research, including direct company engagement. ESG Ratings may also be created using systematic processes which can provide a relative assessment of an issuer’s ESG profile versus others in its peer universe, as well as fundamental analysis by Wellington Management’s dedicated ESG team. ESG Ratings are assigned on a 1 through 5 scale. A rating of 1 is the most positive rating, indicating that the company is a leader among its peers in managing material E, S or G risks or incorporating ESG factors into its practices. A rating of 5 is the most negative, indicating that the company may be lagging its peers in managing certain material E, S or G risks or incorporating ESG factors into its practices. Issuers are assigned both individual E, S and G ratings as well as an overall ESG combined rating.

For any specific company or sector, different ESG factors may have greater or lesser levels of materiality. The ability to directly engage with management teams and members of an issuer’s board of directors may provide more timely perspective or may provide differentiated insight on material ESG issues and may result in different ESG Ratings.

For all Funds, ESG Ratings and research which have been produced is available for consideration in the investment process.

Certain Funds may also use different components of the internal ESG Ratings Framework in different ways. In some cases, for example, Funds may choose to rely on one or more individual environmental, social or governance rating (respectively “E Rating”, “S Rating” or “G Rating”), or may leverage external, third-party ESG ratings independently. Further information on the role ESG Ratings play in a Fund’s investment process can be found in the Fund’s Supplement.

Not all issuers held by the Funds will have an ESG Rating. Currently, issuers may not be rated by Wellington Management where either (1) one or more of the third-party inputs into its ratings process

do not cover the issuer or (2) there is an identification issue related to the mapping of securities to the correct parent company issuer. ESG Ratings are proprietary to Wellington Management and other investment firms or data providers may take different views. The rating process is reliant on data and therefore is exposed to the risks associated with data as described in the Risk Factors section of the Prospectus.

### **Emerging Markets Sovereign ESG Ratings Framework**

Select Funds may use Wellington Management's internal environmental, social and governance ratings (the "Emerging Markets Sovereign ESG Ratings") for emerging markets sovereigns in the investment process. Emerging Markets Sovereign ESG Ratings aim to combine environmental indicators (such as climate physical risk, transition risk, and natural resource risk), social indicators (such as inequality measures, education and labour, and freedom and democracy) and governance indicators (such as political stability, strength of institutions, and quality of policies) into a single data point which can be used in the assessment of the environmental, social and governance activities and attributes of sovereign issuers.

Ratings may be created using both third party and internal research, including direct engagement with policymakers. Emerging Markets Sovereign ESG Ratings may also be created using systematic processes which can provide a relative assessment of an issuer's ESG profile versus others' ESG profiles in its peer universe, as well as fundamental analysis by Wellington Management's dedicated ESG and Emerging Markets Debt analyst team. Emerging Markets Sovereign ESG Ratings are assigned on a 1 through 5 scale. A rating of 1 is the most positive rating, indicating that the sovereign is a leader among its peers in managing material E, S or G risks or incorporating ESG factors into its practices. A rating of 5 is the most negative, indicating that the sovereign may be lagging its peers in managing certain material E, S or G risks or incorporating ESG factors into its practices. Issuers are assigned both individual E, S and G ratings as well as an overall ESG combined rating.

For any country, different ESG factors may have greater or lesser levels of materiality. The ability to directly engage with policymakers may provide more timely perspective or may provide differentiated insight on material ESG issues and may result in different Emerging Markets Sovereign ESG Ratings.

For all relevant Funds, Emerging Markets Sovereign ESG Ratings and research which have been produced is available for consideration in the investment process. Further information on the role ESG Ratings play in a Fund's investment process can be found in the Fund's Supplement. Emerging Markets Sovereign ESG Ratings are proprietary to Wellington Management and other investment firms or data providers may take different views. The rating process is reliant on data and therefore is exposed to the risks associated with data as described in the Risk Factors section of the Prospectus.

ESG Ratings (including Emerging Market Sovereign ESG Ratings) are based on individual E, S and G ratings which are individually weighted according to the Investment Manager's determination of the relative impact of each individual component based on industry or asset class specific factors. The Investment Manager may adjust these weightings from time to time.

### **Securities Lending and Other Transactions**

The Directors reserve the right to enter into collateralised securities lending transactions on behalf of the Funds from time to time which will be carried out in accordance with and subject to the condition and with the limit laid down by the Central Bank from time to time. SFTs and dollar roll transactions are permitted subject to the conditions and within the limits set out in the Central Bank's UCITS Regulations. These may only be used for efficient portfolio management purposes.

The Company may deduct direct and indirect operational costs and fees incurred in the use of these techniques from the revenue delivered to the relevant Fund from the use of such techniques. These costs and fees shall be charged at normal commercial rates and shall not include hidden revenue. The Investment Manager does not receive reimbursements for costs or fees for techniques of this type. The entities to which such costs and fees are paid (including whether such entities are related to the Company or the Depositary) will be disclosed in the annual report.

## **Collateral**

### *Permitted Types of Collateral*

#### *Non-Cash Collateral*

Non-cash collateral must at all times meet with the following requirements:

- (i) **Liquidity:** Non-cash collateral should be highly liquid and traded on a regulated market or multilateral trading facility with transparent pricing in order that it can be sold quickly at a price that is close to pre-sale valuation. Collateral received should also comply with the provisions of the Central Bank's UCITS Regulations;
- (ii) **Valuation:** Collateral must be capable of being valued on at least a daily basis and assets that exhibit high price volatility should not be accepted as collateral unless suitably conservative haircuts are in place;
- (iii) **Issuer credit quality:** Collateral received should be of high quality. Where the issuer was subject to a credit rating by an agency registered and supervised by the European Securities and Markets Authority ("ESMA"), that rating shall be taken into account in the credit assessment process. Where an issuer is downgraded below the two highest short-term credit ratings by this credit rating agency this shall result in a new credit assessment being conducted of the issuer without delay;
- (iv) **Correlation:** Collateral received should be issued by an entity that is independent from the counterparty and is not expected to display a high correlation with the performance of the counterparty;
- (v) **Diversification (asset concentration):** Collateral should be sufficiently diversified in terms of country, markets and issuers with a maximum exposure to a given issuer of 20% of the Net Asset Value. When Funds are exposed to different counterparties, the different baskets of collateral should be aggregated to calculate the 20% limit of exposure to a single issuer;
- (vi) **Immediately available:** Collateral received should be capable of being fully enforced by the Company at any time without reference to or approval from the relevant counterparty; and
- (vii) **Non-cash collateral received cannot be sold, pledged or reinvested by the Company.**

The Company will derogate from the diversification requirement at paragraph (v) and may receive collateral up to 100% of the relevant Fund's Net Asset Value where the collateral received is either transferable securities or money market instruments issued or guaranteed by an EU Member State, one or more local authorities, a third country or a public international body to which one or more EU Member States belong. The permitted issuers for these purposes are listed at paragraph 2.12 of



Appendix II. Where the Company relies on this derogation it should receive securities from at least six different issues, but securities from any single issue should not account for more than 30% of the relevant Fund's Net Asset Value.

#### *Cash collateral*

Reinvestment of cash collateral must at all times, meet with the following requirements:

- (i) Cash received as collateral may only be invested in the following:
  - (a) deposits with an EU credit institution, a credit institution authorised in the remaining Member States of the European Economic Area ("EEA") (Norway, Iceland, Liechtenstein), a credit institution authorised by a signatory state, other than an EU Member State or a Member State of EEA, to the Basle Capital Convergence Agreement of July 1988 (including Switzerland, Canada, Japan, United States, United Kingdom) or a credit institution in a third country deemed equivalent pursuant to Article 107(4) of the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties and trade repositories);
  - (b) high quality government bonds;
  - (c) reverse repurchase agreements provided the transactions are with credit institutions subject to prudential supervision and the Company is able to recall at any time the full amount of cash on an accrued basis; and
  - (d) short-term money market funds as defined in the ESMA Guidelines on a Common Definition of European Money Market Funds (ref CESR/10-049);
- (ii) meet the requirements in section (v) under **Non-Cash Collateral** above, where applicable;
- (iii) Invested cash collateral may not be placed on deposit with the counterparty or a related entity.

#### *Level of collateral required*

In respect of OTC derivative contracts such collateral will be required as is necessary in order to ensure that counterparty exposure is managed within the limits set out in Appendix II.

Otherwise the Funds will require collateral where the exposure to a counterparty has reached a minimum threshold level. That minimum threshold level will be determined by the Investment Manager on a counterparty by counterparty basis and will depend on many factors including legal requirements and the credit quality of the counterparty.

#### *Haircuts*

The Company typically only accepts non-cash collateral that does not exhibit high price volatility and therefore a haircut policy is not required. If any of the Funds did hold non-cash collateral that exhibited high price volatility, then the Investment Manager would negotiate appropriate haircuts taking into account such factors as the issuer credit quality and price volatility of the collateral and, where relevant, the outcome of any stress tests.

### *Stress Testing*

If a Fund receives collateral for 30% or more of its assets then the collateral received will be incorporated into the liquidity stress testing to ensure that the liquidity risk attached to the collateral is assessed, any reporting required is put in place and mitigation action taken.

### **Other**

Any investment by a Fund in REITs will not affect that Fund's ability to meet its redemption obligations. Any common stock received in exchange for debt will be sold within six months, unless the Investment Manager believes it to be in the client's best interests to retain the holding.

### **RISK FACTORS**

**AN INVESTMENT IN A FUND INVOLVES A NUMBER OF RISKS INCLUDING A POSSIBLE LOSS OF THE AMOUNT INVESTED. MOREOVER, THERE CAN BE NO GUARANTEE OR ASSURANCE THAT A FUND WILL ACHIEVE ITS INVESTMENT OBJECTIVE.**

**THE DISCUSSION BELOW IS OF GENERAL NATURE AND IS INTENDED TO DESCRIBE VARIOUS RISK FACTORS WHICH MAY BE ASSOCIATED WITH AN INVESTMENT IN THE SHARES OF A FUND. THE FOLLOWING ARE A NUMBER OF RISK FACTORS WHICH MAY BE ASSOCIATED WITH AN INVESTMENT IN THE SHARES OF A FUND TO WHICH THE ATTENTION OF INVESTORS IS DRAWN. HOWEVER, THESE ARE NOT INTENDED TO BE EXHAUSTIVE AND THERE MAY BE OTHER CONSIDERATIONS THAT SHOULD BE TAKEN INTO ACCOUNT IN RELATION TO AN INVESTMENT. INVESTORS SHOULD CONSULT THEIR OWN ADVISERS BEFORE CONSIDERING AN INVESTMENT IN THE SHARES OF A PARTICULAR FUND. WHAT FACTORS WILL BE OF RELEVANCE TO THE SHARES OF A PARTICULAR FUND WILL DEPEND UPON A NUMBER OF INTERRELATED MATTERS INCLUDING, BUT NOT LIMITED TO, THE NATURE OF THE SHARES AND THE UNDERLYING INVESTMENTS AND ASSETS OF EACH FUND. INVESTORS SHOULD ALSO REVIEW THE SECTION HEADED RISK FACTORS IN EACH SUPPLEMENT IN THIS REGARD.**

**NO INVESTMENT SHOULD BE MADE IN THE SHARES OF A PARTICULAR FUND UNTIL CAREFUL CONSIDERATION OF ALL THOSE FACTORS HAS BEEN MADE.**

### **Central Clearing**

A central clearing counterparty (CCP) stands between over-the-counter (OTC) derivatives counterparties, insulating them from each other's default. Effective clearing seeks to mitigate systemic risk by lowering the risk that defaults spread from counterparty to counterparty. However, the extent to which CCPs mitigate the likelihood and severity of knock-on defaults that arise from the failure of a large counterparty is unclear.

### **Central Securities Depositories**

In accordance with the UCITS Directive, entrusting the custody of the Company's assets to the operator of a securities settlement system ("SSS") is not considered as a delegation by the Depositary and the Depositary is exempted from the strict liability of restitution of assets. A central securities depository ("CSD") being a legal person that operates a SSS and provides in addition other core services should not be considered as a delegate of the Depositary irrespective of the fact that the custody of the Company's assets have been entrusted to it. There is however some uncertainty around the meaning to

be given to such exemption, the scope of which may be interpreted narrowly by some supervisory authorities, notably the European supervisory authorities.

### **Collateral Reuse**

Where a Fund reinvests collateral it receives from a counterparty under a trading agreement, there is a risk that such collateral reinvestment could result in a reduction of the value of the collateral capital (because the investment declines in value). This, in turn, may cause losses to the Fund because it is obliged to return collateral to the counterparty. The Funds are limited to how they can reinvest collateral as set out in the section titled **Collateral**.

Where a Fund provides collateral under a trading agreement to a counterparty and that counterparty exercises a right of reuse of that collateral, the Fund will be subject to the following collateral re-use risks and consequences:

- its rights, including any proprietary rights, in that collateral will be replaced by an unsecured contractual claim for delivery of equivalent collateral subject to the terms of the relevant collateral arrangement;
- the collateral may not be held by the counterparty in accordance with client asset rules, and may not benefit from any client asset protection rights;
- in the event of the counterparty's insolvency or default, the Fund's claim against the counterparty for delivery of equivalent collateral may not be secured and will be subject to the terms of the relevant collateral arrangement and applicable law and, accordingly, the Fund may not receive such equivalent collateral or recover the full value of the financial instruments;
- in the event that the counterparty is not able to readily obtain equivalent collateral to deliver to the Fund at the time required: the Fund may be unable to fulfil its settlement obligations under a hedging or other transaction it has entered into in relation to those particular collateral assets.

### **Common Reporting Standard**

The Company may be subject to the Standard for Automatic Exchange of Financial Account Information in Tax Matters and its Common Reporting Standard ("CRS") as set out in the Irish law on the Common Reporting Standard (the "CRS Law").

Under the terms of the CRS Law, the Company is likely to be treated as an Irish Reporting Financial Institution. As such, as of 30 June 2017 and without prejudice to other applicable data protection provisions as set out in the Company documentation, the Company will be required to annually report to the Irish tax authorities personal and financial information related, inter alia, to the identification of, holdings by and payments made to (i) investors that are reportable persons under the CRS Law, and (ii) Controlling Persons (as defined below) of certain non-financial entities which are themselves reportable persons. This information, as exhaustively set out in the CRS Law, will include personal data related to the reportable persons (the "CRS Information").

The Company's ability to satisfy its reporting obligations under the CRS Law will depend on each investor providing the Company with the required CRS Information, as explained above, along with the required supporting documentary evidence. In this context, the investors are hereby informed that, as data controller, the Company will process such CRS Information for the purposes as set out in the CRS Law. The investors undertake to inform their controlling persons, if applicable, of the processing of their CRS Information by the Company.

For the purposes of this section, "Controlling Person" means the natural persons who exercise control over an entity. In the case of a trust, the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term "Controlling Persons" must be interpreted in a manner consistent with the Financial Action Task Force Recommendations.

Investors are further informed that the CRS Information related to reportable persons within the meaning of the CRS Law will be disclosed to the Irish tax authorities annually for the purposes set out in the CRS Law. In particular, reportable persons are informed that certain operations performed by them will be reported to them through the issuance of statements, and that part of this information will serve as a basis for the annual disclosure to the Irish tax authorities. Similarly, investors undertake to inform the Company within thirty (30) days of receipt of these statements should any personal data not be accurate. The investors further undertake to immediately inform the Company of and provide the Company with all supporting documentary evidence of any changes related to the CRS Information after occurrence of such changes. Any investor that fails to comply with the Company's CRS Information or documentation requests may be held liable for penalties imposed on the Company and attributable to such investor's failure to provide the CRS Information or subject to disclosure of the CRS Information by the Company to the Irish tax authorities. The Company may, in its sole discretion, redeem such Shareholder's shares. While the Company will make reasonable efforts to seek documentation from Shareholders to comply with these rules and to allocate any penalties imposed to be deducted under CRS to Shareholders whose noncompliance caused the imposition or deduction of the tax, it is possible that complying Shareholders in the Company may be affected by the presence of such non-complying Shareholders.

### **Concentration**

Concentration of investments in a relatively small number of securities, certain sectors or specific regions or countries will make a Fund susceptible to higher volatility since the value of the Fund will vary more in response to changes in the market value of these securities, sectors, regions or countries.

The portfolio of certain Funds will be concentrated in specific sectors, for example the health care or technology sectors, and therefore may be subject to more rapid changes in value than would be the case if the relevant portfolio was more widely diversified among industry sectors. The securities of companies in the health care and technology sectors, especially those of smaller, research-oriented companies, tend to be more volatile than the overall market. The success of investments in the health care and technology sectors is often based upon expectations about future products, research progress, and/or new product filings with regulatory authorities. In addition, a number of these companies may have limited operating histories. As a result, these companies may face undeveloped or limited markets, have limited products, have no proven profit-making history, operate at a loss, have limited access to capital and/or be in the developmental stages of their businesses.

The health care and technology sectors are subject to extensive government regulation. These industries will be affected by government regulatory requirements, regulatory approval for new drugs and medical products, patent protection considerations, product liability concerns, and similar significant matters. As these factors impact the industries, the value of the Funds whose investments are concentrated in such industries may fluctuate significantly over relatively short periods of time.

Further, many companies within the health care and technology sectors may rely on a combination of patent and trade secret protection and non-disclosure agreements to establish and protect their

proprietary rights, which are frequently essential to the growth and profitability. There can be no assurance that a particular company will be able to protect these rights or will have the financial resources to do so, or that competitors will not develop or patent technologies that are substantially equivalent or superior to the products of a company in which the Funds invest.

### **Contractual Settlement**

The Investment Manager will on behalf of all investors and Shareholders place orders for the purchase of securities for the account of the relevant Fund before receipt of payment of subscription proceeds, as a means to reduce the impact of subscriptions on the performance of the Fund. While this protocol is made available equally to benefit all Shareholders, there is a possibility that a particular subscriber may settle his purchase order late, or fail to settle it entirely. In that case, the relevant Fund will be exposed to interest costs and/or possible market losses. Although the Company on behalf of the relevant Fund should in that case have a valid claim to recoup any damages from the defaulting subscriber, there is no guarantee that such a claim will either be successful or enforceable in judgment, which could result in a Fund (and its Shareholders) suffering a loss on their investment.

### **Convertibles, including Contingent Convertible and Contingent Capital Securities (CoCos)**

The market value of convertible bonds tends to decline as interest rates rise. Because of the conversion feature the market value of convertible bonds also tends to vary with fluctuations in the market value of the underlying common or preferred security.

Due to contingent write-down, write-off and conversion features of contingent convertible securities, such high-yielding instruments may have substantially greater risk than other forms of securities in times of credit stress. This means that, if a trigger level is breached, depending on the terms, the security may be automatically written-down, written-off or converted. This action could have an adverse effect on a Fund's ability to achieve its investment objective because a conversion may occur before the Fund might otherwise prefer. The Fund may even suffer a complete loss with no chance of recovery even if the issuer remains in existence.

CoCos have terms which vary from issuer to issuer and may expose investors to additional risks. Coupon payment risk is where coupon payments may be indefinitely deferred or cancelled with no interest accumulation and potentially no restriction on the issuer to pay dividends to equity holders or coupons to bond holders which rank *pari passu* or junior to the CoCo bond holders. Coupon cancellation may be at the option of the issuer or its regulator but may also be mandatory under the European Capital Requirements Directive (CRD IV) and related applicable laws and regulation. This mandatory deferral may be at the same time that equity dividends and bonuses may also be restricted, but some CoCo structures allow the bank at least in theory to keep on paying dividends whilst not paying CoCo holders. Mandatory deferral is dependent on the amount of required capital buffers a bank is asked to hold by regulators. In addition it is possible in certain circumstances, e.g., issuer discretion not to pay and / or insufficient distributable profits to pay interest in full or in part, for interest payments on certain CoCos to be cancelled in full or in part by the issuer, without prior notice to bondholders. Therefore, there can be no assurances that investors will receive payments of interest in respect of CoCos. Unpaid interest may not be cumulative or payable at any time thereafter, and bondholders shall accordingly have no right, whether in a liquidation, dissolution or winding-up or otherwise, to claim the payment of any foregone interest which may impact the value of the Fund.

Issuers of CoCos operate within the financial services sector so investment in such instruments may entail concentration risk as described above.

## **Counterparty**

The institutions, including brokerage firms and banks, with which a Fund (directly or indirectly) will trade or invest, or to which its assets will be entrusted for custodial purposes, may encounter financial difficulties that impair the operational capabilities or the capital position of a Fund.

## **Credit and Index Linked Securities**

Credit and index linked securities are derivative instruments which may entail substantial risks. Such instruments may be subject to significant price volatility. The company issuing the instrument may fail to pay the amount on maturity. The underlying investment or security may not perform as expected by the Investment Manager. Markets, underlying securities and indexes may move in a direction that was not anticipated by the Investment Manager.

## **Cross Liability**

The Company is structured as an umbrella fund with segregated liability between its Funds. As a matter of Irish law, the assets of one Fund will not be available to meet the liabilities of another. However, the Company is a single entity that may operate or have assets held on its behalf or be subject to claims in other jurisdictions that may not necessarily recognise such segregation of liability.

## **Currency**

Because a Fund may invest in securities and hold active currency positions that are denominated in currencies other than its Base and/or Dealing Currency, each Fund may be exposed to currency exchange risk. For example, changes in exchange rates between currencies or the conversion from one currency to another may cause the value of a Fund's investments to diminish or increase. Currency exchange rates may fluctuate over short periods of time. They generally are determined by supply and demand in the currency exchange markets and the relative merits of investments in different countries, actual or perceived changes in interest rates and other complex factors. Currency exchange rates can be affected unpredictably by intervention (or the failure to intervene) by government or central banks, or by currency controls or political developments. Certain Funds, but not all, have placed limits on the percentage of such Funds' Net Asset Value that may be exposed to currencies other than the Base Currency of the relevant Fund.

Subject to the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time, the appropriate hedging strategy used will be at the discretion of the Investment Manager in accordance with the investment style of the Fund. This may include hedging the Dealing Currency against the Base Currency of the Fund or against the other currencies in which the assets of the relevant Fund may be denominated (based on either actual exposure or benchmark weights). There can be no assurance that the strategy chosen by the Investment Manager will be successful.

## **Information Security (including Cyber Security)**

Information security refers to the management of the confidentiality, integrity and availability of data in both physical and digital form. Cyber security refers specifically to protecting data in digital form. The Company or any of its service providers, including the Management Company, may be subject to risks arising from incidents related to information security breaches and/or cyber security incidents. An information security breach or cyber security incident could result in a financial loss, reputational damage or operational disruption to the Company or one of its service providers. In general, information security breaches and/or cyber security incidents can result from deliberate attacks or unintentional events.

Cyber security attacks include, but are not limited to, gaining unauthorised access to digital systems (e.g., through "hacking" or malicious software coding) for purposes of misappropriating assets or sensitive information, corrupting data or causing operational disruption. Cyber-attacks also may be carried out in a manner that does not require gaining unauthorised access, such as causing denial-of-service attacks on websites (i.e., efforts to make services unavailable to intended users). Cyber security incidents affecting the Company, the Management Company or their delegates, or other service providers such as financial intermediaries have the ability to cause disruptions and impact business operations, potentially resulting in financial losses, including by interference with the ability to calculate the Net Asset Value of the Company; impediments to trading for the Company's Funds; the inability of Shareholders to transact business with the Company; violations of applicable privacy, data security or other laws; regulatory fines and penalties; reputational damage; reimbursement or other compensation or remediation costs; legal fees; or additional compliance costs. Similar adverse consequences could result from cyber security incidents affecting issuers of securities in which the Company invests, counterparties with which the Company engages in transactions, governmental and other regulatory authorities, exchange and other financial market operators, banks, brokers, dealers, insurance companies and other financial institutions and other parties.

While the Company, the Management Company and their delegates have put in place information security risk management systems and business continuity plans which are designed to reduce the risks associated with information security and cyber security, there are inherent limitations in any information security risk management system or business continuity plan, including the possibility that certain risks cannot be and/or have not been identified.

### **Depositary**

The Investment Manager may decide from time to time to invest in a country where the Depositary has no correspondent. In such a case, the Depositary will have to identify and appoint after due diligence a local custodian. This process may take time and in the meantime deprive the Investment Manager of investment opportunities.

In the same manner, the Depositary shall assess on an ongoing basis the custody risk of the country where the Company's assets are safe-kept. The Depositary may identify from time to time a custody risk in a jurisdiction and recommend to the Investment Manager to realise the investments in that jurisdiction immediately. In doing so, the price at which such assets will be sold may be lower than the price the Company would have received in normal circumstances, potentially affecting the performance of the relevant Funds.

As a continuing security for the payment of its duties under the Depositary Agreement (like the fees to be paid to the Depositary for its services or also overdraft facilities offered by the Depositary), the Depositary shall have a pledge granted by the Company over the assets the Depositary or any third party may from time to time hold directly for the account of the Company, in any currency.

In certain circumstances, the third party to whom the Depositary has delegated safekeeping duties might use nominee companies which are wholly owned subsidiaries of such third party and created for the sole purpose of doing acts which are strictly necessary to maintain the holding of the Company's assets on behalf of the Depositary. Those nominee companies might not meet the conditions laid down by the UCITS Directive relating to third parties to whom the safekeeping can be delegated by the Depositary, notably they might not be subject to prudential supervision.

Under the UCITS Directive, cash is to be considered as a third category of assets beside financial instruments that can be held in custody and other assets. The UCITS Directive imposes specific cash flow monitoring obligations. Depending on their maturity, term deposits could be considered as an investment and consequently would be considered as other assets and not as cash.

## **Duration**

Duration is a measure of the expected life of a debt obligation on a present value basis. Duration takes the length of the time intervals between the present time and the time that the interest and principal payments are scheduled or, in the case of a callable bond, the time the principal payments are expected to be received, and weights them by the present values of the cash to be received at each future point in time. For debt obligations with interest payments occurring prior to the payment of principal, duration will usually be less than maturity. In general, all else being equal, the lower the stated or coupon rate of the interest of a fixed income security, the longer the duration of the security; conversely, the higher the stated or coupon rate of a fixed income security, the shorter the duration of the security.

Holding long futures or call option positions will lengthen the duration of a Fund's portfolio. Holding short futures or put options will shorten the duration of a Fund's portfolio.

A swap agreement on an asset or group of assets may affect the duration of the Fund depending on the attributes of the swap. For example, if the swap agreement provides a Fund with a floating rate of return in exchange for a fixed rate of return, the duration of the Fund would be modified to reflect the duration attributes of a similar security that the Fund is permitted to buy.

There are some situations where even the standard duration calculation does not properly reflect the interest rate exposure of a security. For example, floating- and variable-rate securities often have final maturities of ten or more years; however, their interest rate exposure corresponds to the frequency of the coupon reset. Another example where the interest rate exposure is not properly captured by maturity is mortgage pass-through securities. The stated final maturity of such securities is generally 30 years, but current prepayment rates are more critical in determining the securities' interest rate exposure. Finally, the duration of the debt obligation may vary over time in response to changes in interest rates and other market factors.

## **Emerging Markets**

A Fund faces a number of additional risks because of any investments in securities of companies located in emerging markets, including:

**Investment and repatriation restrictions:** A number of emerging markets restrict, to varying degrees, foreign investment in securities. Restrictions may include maximum amounts foreigners can hold of certain securities, and registration requirements for investment and repatriation of capital and income. New or additional restrictions may be imposed subsequent to a Fund's investment in a given market.

**Currency fluctuations** can be severe in emerging markets that have both floating and/or "fixed" exchange rate regimes. The latter can undergo sharp one-time devaluations.

**Potential market volatility:** Many emerging markets are relatively small, have low trading volumes, suffer periods of illiquidity and are characterised by significant price volatility. Regulation and oversight of trading activity may not be up to the standards of developed countries.



Political instability and government interference in the private sector: This varies country by country, and may evolve to the detriment of Fund holdings. In particular, some emerging markets have no legal tradition of protecting shareholder rights.

Financial disclosure and accounting standards: Potential investments may be difficult to evaluate given lack of information as well as the use in emerging markets of accounting, auditing and financial reporting standards that differ from country to country and from those of developed countries.

Settlement: The trading and settlement practices of some of the stock exchanges or markets on which a Fund may invest may not be the same as those in more developed markets, which may increase settlement risk and/or result in delays in realising investments made by a Fund.

Custodial risk: Local custody services remain underdeveloped in many emerging market countries and there is a transaction and custody risk involved in dealing in such markets. In certain circumstances a Fund may not be able to recover or may encounter delays in the recovery of some of its assets. Such circumstances may include uncertainty relating to, or the retroactive application of, legislation, the imposition of exchange controls or improper registration of title. In some emerging market countries evidence of title to shares is maintained in "book-entry" form by an independent registrar who may not be subject to effective government supervision, which increases the risk of the registration of a Fund's holdings of shares in such markets being lost through fraud, negligence or mere oversight on the part of such independent registrars. The costs borne by a Fund in investing and holding investments in such markets will generally be higher than in organised securities markets.

Taxation: Taxation of dividends and capital gains varies among countries and, in some cases, is comparatively high. In addition, emerging markets typically have less-well-defined tax laws and procedures and such laws may permit retroactive taxation, so that a Fund could in the future become subject to local tax liability that had not been reasonably anticipated when an investment was made.

**Where a Fund invests more than 20% of its Net Asset Value in emerging markets an investment in that Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

## Equity

Equity shares of companies will fluctuate in value due to market, economic, political and other factors. Such fluctuations may be substantial, and the fluctuation of small and mid-cap companies may be greater than would occur in similar market conditions for the equity shares of larger capitalisation companies. There is frequently less market liquidity for the shares of small and mid-cap companies than for larger capitalisation companies. In the case of companies located in or deriving substantial revenue from emerging markets, fluctuations in value due to market, economic, political and other factors may be substantial, and may be greater than would occur in similar market conditions for the equity shares of companies domiciled in OECD countries. Shares purchased in an initial public offering will relate to a company that has no track record operating as a public company. Such shares may be more volatile than those issued by more seasoned companies. Shares issued in an initial public offering (IPO) can also be subject to a lock-up period which in an Indian IPO can be for up to 90 days, for example, and which can alter a fund's ability to deal in the shares during the period.

## Exchange Traded Funds

A Fund may invest in the securities of Exchange Traded Funds (“ETFs”) in different asset classes and sectors. Shares or units in ETFs represent interests in (i) fixed funds of equity shares or debt securities designed to track the price and dividend yield performance of broad-based securities indices (such as the S&P 500 or NASDAQ 100); (ii) “baskets” of industry-specific securities; or (iii) commodities. Shares or units in ETFs are traded on an exchange like equities, and the value of such shares or units fluctuate in relation to changes in the value of the underlying asset of the ETF. However, the market price of shares or units in ETFs may not be equivalent to the pro rata value of the underlying asset of the ETF. Shares and units of ETFs are subject to the risks of an investment in a broad-based Fund of equity shares or to the risks of a concentrated, industry-specific investment in equity shares. Furthermore, certain ETFs in which the Funds may invest may leverage their assets, thereby significantly increasing the potential volatility of such ETFs.

### **Financial Derivatives Instruments**

Certain risks may be associated with the use by a Fund of derivative instruments as follows:

**Market Risk:** This is a general risk that the value of a particular derivative may change in a way which may be detrimental to a Fund's interests and the use of derivative techniques may not always be an effective means of, and sometimes could be counter-productive to, a Fund's investment objective.

**Control and Monitoring:** Derivative instruments are highly specialised and require specific techniques and risk analysis. In particular, the use and complexity of derivative instruments require the maintenance of adequate controls to monitor the transactions entered into, the ability to assess the risk that a derivative instrument may add to a Fund and the ability to forecast the relative price, interest rate or currency rate movements correctly.

**Liquidity Risk:** Liquidity risk exists when a particular instrument is difficult to purchase or sell. If a derivative transaction is particularly large or if the relevant market is illiquid (as is the case with many privately negotiated derivatives), it may not be possible to initiate a transaction to liquidate a position at an advantageous price, to assess or value a position or to assess the exposure to risk. An adverse price movement in a derivative position may also require a cash payment to counterparties that might in turn require, if there is insufficient cash available in a Fund, the sale of investments under disadvantageous conditions.

**Counterparty Risk:** A Fund may enter into derivative transactions in over-the-counter markets, which will expose the Fund to the credit of its counterparties and their ability to satisfy the terms of such contracts. A Fund may be exposed to the risk that the counterparty may default on its obligations to perform under the relevant contract. In the event of the bankruptcy or insolvency of a counterparty, a Fund could experience delays in liquidating the position as well as significant losses, including declines in value during the period in which the Fund seeks to enforce its rights, the inability to realise any gains during such period and fees and expenses incurred in enforcing its rights.

**Legal Risk:** There is a possibility that the agreements governing the derivative techniques may be terminated due, for instance, to supervening illegality or change in the tax or accounting laws relative to those at the time the agreement was originated. There is also a risk if such agreements are not legally enforceable or if the derivative transactions are not documented correctly.

**Leverage Risk:** Leverage may be employed as part of the investment strategy when using derivatives. Derivatives may contain a leverage component and consequently any adverse changes in the value or level of the underlying asset can result in a loss greater than the amount invested in the derivative itself.

**Other Risks:** Other risks in using derivative instruments include the risk of differing valuations of derivative instruments arising out of different permitted valuation methods and the inability of derivative instruments to correlate perfectly with underlying securities, rates and indices. Many derivative instruments, in particular over-the-counter derivative instruments, are complex and often valued subjectively and the valuation can only be provided by a limited number of market professionals which often are acting as counterparties to the transaction to be valued. Inaccurate valuations can result in an increased cash payment to counterparties or a loss of value to a Fund. Derivative instruments do not always perfectly or even highly correlate or track the value of the securities, rates or indices they are designed to track.

The swaps market is a relatively new market and is largely unregulated. It is possible that developments in the swaps market, including potential government regulation, could adversely affect a Fund's ability to terminate existing swap agreements or to realise amounts to be received under such agreements. Whether a Fund's use of swap agreements will be successful will depend on the Investment Manager's ability to correctly predict whether certain types of investments are likely to produce greater returns than other investments. A Fund bears the risk of loss of the amount expected to be received under a swap agreement in the event of the default or bankruptcy of a swap agreement counterparty. The risk arising to a Fund in a total return swap is credit risk in the event that the counterparty is unable to meet its payment obligations to the Fund under the terms of the total return swap. Further as noted under **Derivatives Generally** below, the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") and the European Markets and Infrastructure Regulation ("EMIR") include provisions that require increased regulation of derivatives markets. Notably in relation to swaps the Dodd-Frank Act and EMIR have introduced mandatory execution and clearing of certain swaps, as well as new record keeping and reporting requirements. This increased regulation may increase the costs of entering into certain transactions.

**Derivatives Generally:** There has been an international effort to increase the stability of the over-the-counter derivatives market in response to the recent financial crisis. In the United States, the Dodd-Frank Act includes provisions that comprehensively regulate the over-the-counter derivatives markets. In Europe, the European Parliament has adopted EMIR, a regulation on over-the-counter derivatives, central counterparties and trade repositories, which also comprehensively regulates the over-the-counter derivatives markets. These regulations will impose compliance costs on the Company. They will also increase the dealers' costs, which are expected to be passed through to other market participants in the form of higher fees and less favourable dealer marks. They may also render certain strategies in which the Company might otherwise engage impossible or so costly that they will no longer be economical to implement. The overall impact of these regulations on the Company is highly uncertain and it is unclear how the over-the-counter derivatives markets will adapt to this new regulatory regime.

**Central clearing risk:** A central clearing counterparty ("CCP") stands between over-the-counter ("OTC") derivatives counterparties, insulating them from each other's default. Effective clearing seeks to mitigate systemic risk by lowering the risk that defaults propagate from counterparty to counterparty. However, the extent to which CCPs mitigate the likelihood and severity of knock-on defaults that propagate from the failure of a large counterparty is unclear.

### **Fixed Income and Other Debt Securities**

Fixed income securities and other debt securities are subject to many risk factors, including economic conditions, government regulations, market sentiment, and local and international political events. The market value of these securities in which a Fund invests will fluctuate in response to changes in creditworthiness of the issuer, interest rates, currency values, and other economic, political and market factors. Such fluctuations may be substantial. There is a risk that one or more issuers of securities held

by a Fund may default in payment of interest and/or principal. That portion of any Fund invested in securities which are rated below investment grade, or are deemed equivalent thereto by the Investment Manager, are subject to significantly greater risk of such defaults. Pass through instruments such as mortgage related and asset backed securities are subject to prepayment risk, which is the possibility that the principal of the loans underlying the securities may be prepaid at any time. As a general rule, prepayments increase during a period of falling interest rates and decrease during a period of rising interest rates.

A Fund may invest in debt securities which rank junior to other outstanding securities and obligations of the issuer, all or a significant portion of which may be secured by substantially all of that issuer's assets. The Fund may invest in debt securities which are not protected by financial covenants or limitations on additional indebtedness. This would expose the Fund to credit and liquidity risks. In addition, the market for credit spreads is often inefficient and illiquid, making it difficult to accurately calculate discounting spreads for valuing financial instruments. Investment in a debt instrument will normally involve the assumption of interest rate risk.

A substantial number of the securities which a Fund holds may be debt securities rated below "investment grade" (Baa3 by Moody's and BBB- by Standard & Poor's) or unrated securities of comparable quality, sometimes known as "junk bonds" or high yield bonds. **Where a Fund invests more than 30% of its Net Asset Value in below investment grade securities an investment in that Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.** These lower rated bonds are considered by credit rating agencies to be speculative and to carry a high level of risk. The lower rated securities in which a Fund will invest will have a significantly greater risk of default in payments of interest, principal, or both, than the risk of default for investment grade bonds. Issuers of below investment grade securities present a higher risk of bankruptcy or reorganisation than issuers of investment grade bonds, or may have recently been in bankruptcy or reorganisation proceedings.

The secondary market for lower rated securities is typically much less liquid than the market for investment grade bonds, frequently with significantly more volatile prices and larger spreads between bid and asked price in trading. The market price of lower rated securities will be affected by the bond market's perception of credit quality and the effect of stronger or weaker economic growth as well as political developments.

The market price of lower rated securities will also be affected by general changes in interest rates (decreasing as rates rise, and increasing as rates fall) that affect the market price of all bonds, although lower rated securities may be less sensitive to interest rate changes than investment grade bonds. The below investment grade security market at times will be very illiquid. Market prices of lower rated securities may be affected by imbalances in sell and buy orders among institutional investors and dealers. In addition to credit risk and liquidity risk concerns, the market price of lower rated securities in particular may be adversely impacted by legislative or regulatory developments, such as determinations that certain categories of institutional investors must divest their below investment grade holdings, or changes in rules regarding taxation or corporate reorganisations.

A Fund may also have to sell holdings of below investment grade securities at unfavourable prices in order to raise proceeds to pay for redemptions of Shares.

Any default in the payment of interest by an issuer of below investment grade securities will adversely affect a Fund if a distribution has already been made by the Fund on the basis of such interest being due and payable to the Fund.

The Investment Manager seeks to mitigate the risk of high yield investing by carefully selecting below investment grade securities which it believes offer an investment return that reasonably compensates a Fund for the investment risk assumed, and by diversifying the Fund to minimise the adverse effect of default or substantial reduction in the market price of any below investment grade security in the Fund. The Investment Manager will actively manage the Funds, and will buy and sell portfolio securities based upon economic, financial, political and issuer credit analysis. There is no assurance that the Investment Manager will succeed in avoiding or mitigating the risks associated with below investment grade security investing.

A Fund's net income may decline or increase, based upon changes in the prevailing interest rates in the bond market at the times that it purchases bonds with proceeds from additional net investments in the Fund, or the proceeds from the sale of other portfolio securities in the Fund.

### **High Turnover**

The investment strategy of a Fund may involve the taking of frequent trading positions, as well as investment positions. As a result of portfolio turnover and brokerage commissions, expenses of that Fund may significantly exceed those of other Funds of comparable size that trade less frequently.

### **Indian Rupee Repatriation Risk**

A Fund investing in the Indian market will have a standing instruction in place with the custodian/sub-custodian to convert all principals and profits denominated in Rupee back to the relevant Fund in its Base Currency and repatriate out of India. Such amounts are fully repatriable subject to payment of applicable tax (withholding tax on interest income and capital gains tax) and submission of tax consultant's certificate. While the relevant Fund will appoint a local sub-custodian in India, the Depository will take responsibility for the local sub-custodian in India or any other sub-custodian appointed in place of an earlier sub-custodian (on account of cancellation of the custodian license of the earlier sub-custodian or any other reasons as agreed with the earlier sub-custodian). The exchange rate used for converting principals and/or profits denominated in Rupee back to the Base Currency of the relevant Fund and repatriating out of India will be determined based on market rates on the day the currency is converted. In case of redemption of Shares, the valuation date for the redeeming Shareholder will precede the conversion date by several days, which will expose the remaining Shareholders of the Fund to currency risk and potential losses in case of depreciation of the Rupee between the valuation date and the conversion date. An official exchange rate is released by the Reserve Bank of India (RBI) every working day. Currently, there are no regulations/restrictions imposed on foreign institutional investors (FIIs)/sub-accounts under Indian laws, which restrict repatriation of funds by the FIIs/sub-accounts. Investments made by FIIs/sub-accounts in Indian securities are on fully repatriable basis. The RBI has extended the same treatment to foreign portfolio investors as well.

### **Investment in China**

#### **Bond Connect**

*Risks linked with dealing in securities in China via Bond Connect*

Some Funds may seek exposure to fixed income securities dealt on the CIBM through Bond Connect ("Bond Connect Securities"). Bond Connect is a mutual bond market access between Hong Kong and the PRC established by China Foreign Exchange Trade System (CFETS) & National Interbank Funding Centre, China Central Depository & Clearing Co., Ltd, Shanghai Clearing House (together, the "Mainland Financial Infrastructure Institutions"), and Hong Kong Exchanges and Clearing Limited and Central Moneymarkets Unit (CMU) (together, the "Hong Kong Financial Infrastructure

Institutions”). Eligible foreign investors are allowed to invest in Bond Connect Securities through a cross border platform, which facilitates the efficient trading by overseas institutional investors in the PRC bond market (Northbound link). Northbound Trading will follow the current policy framework for overseas participation in the CIBM.

There will be no investment quota for Northbound Trading.

To the extent that a Fund’s investments in China are dealt via Bond Connect, such dealing may be subject to additional risk factors.

**Regulatory risks:** Bond Connect rules and regulations are relatively new. The application and interpretation of such investment regulations are therefore relatively untested and there is no certainty as to how they will be applied as the PRC authorities and regulators have been given wide discretion in such investment regulations and there is no precedent or certainty as to how such discretion may be exercised now or in the future. In addition, there can be no assurance that the Bond Connect rules and regulations will not be abolished in the future. A Fund(s) which invests in Bond Connect Securities may be adversely affected as a result of any such changes or abolition.

**Custody risks:** Under the prevailing regulations in PRC, eligible foreign investors who wish to invest in Bond Connect Securities may do so via an offshore custody agent approved by the Hong Kong Monetary Authority (“HKMA”) (“Offshore Custody Agent”), who will be responsible for the account opening with the relevant onshore custody agent approved by PBOC. Since the account opening for investment in the CIBM market via Bond Connect has to be carried out via an offshore custody agent the relevant Fund is subject to the risks of default or errors on the part of the Offshore Custody Agent.

**Trading risks:** Trading in securities through the Bond Connect may be subject to clearing and settlement risk. If the PRC clearing house defaults on its obligation to deliver securities / make payment, the Fund may suffer delays in recovering its losses or may not be able to fully recover its losses.

**Market and Liquidity Risks:** Market volatility and potential lack of liquidity due to low trading volumes of certain debt securities may result in prices of certain debt securities traded on the CIBM to fluctuate significantly. The Funds investing in the CIBM are therefore subject to liquidity and volatility risks and may suffer losses in trading PRC bonds. The bid and offer spreads of the prices of such PRC bonds may be large, and the relevant Funds may therefore incur significant trading and realisation costs and may even suffer losses when selling such investments.

**Investment restrictions:** Investments into Bond Connect are not subject to any quota but should the relevant Chinese authorities suspend account opening or trading via Bond Connect, the relevant Fund’s ability to invest in CIBM will be limited and, and the relevant Fund may not be able to effectively pursue its investment strategy or it may have an adverse effect on the relevant Fund’s performance as the relevant Fund may be required to dispose of its CIBM holdings. The relevant Fund may also suffer substantial losses as a result.

**Chinese Local Credit Rating Risk:** Certain Funds may invest in securities the credit ratings of which are assigned by Chinese local credit rating agencies. However, the rating criteria and methodology used by such agencies may be different from those adopted by most of the established international credit rating agencies. Therefore, such rating system may not provide an equivalent standard for comparison with securities rated by international credit rating agencies. Investors should be cautious when they refer to ratings assigned by Chinese local credit agencies, noting the differences in rating criteria mentioned above. If assessments based on credit ratings do not reflect the credit quality of and the risks inherent in a security, investors may suffer losses, possibly greater than originally envisaged.

Operational Risk: Trading through Bond Connect is performed through newly developed trading platforms and operational systems. There is no assurance that such systems will function properly or will continue to be adapted to changes and developments in the market. In the event that the relevant systems fail to function properly, trading through Bond Connect may be disrupted. A Fund's ability to trade through Bond Connect (and hence to pursue its investment strategy) may therefore be adversely affected. In addition, where a Fund invests in the CIBM through Bond Connect, it may be subject to risks of delays inherent in the order placing and/or settlement systems.

#### *Beneficial owner of Bond Connect Securities*

The Funds' Bond Connect Securities will be held following settlement in an investor's segregated securities account at the Central Moneymarkets Unit ("CMU") as central securities depository in Hong Kong by custodians as clearing participants. The CMU in turn holds Bond Connect Securities of all its participants through an omnibus securities account (Linkage Securities Account) in the name of the HKMA at the China Central Depository & Clearing Co., Ltd and the Shanghai Clearing House in the PRC. Because CMU is only a nominee holder and not the beneficial owner of Bond Connect Securities, in the unlikely event that CMU becomes subject to winding up proceedings in Hong Kong, investors should note that Bond Connect Securities will not be regarded as part of the general assets of CMU available for distribution to creditors even under PRC law. However, CMU will not be obliged to take any legal action or enter into court proceedings to enforce any rights on behalf of investors in Bond Connect Securities in PRC. Funds investing through the Bond Connect holding the Bond Connect Securities through CMU are the beneficial owners of the assets and are therefore eligible to exercise their rights through the nominee only.

However, physical deposit and withdrawal of Bond Connect Securities are not available under the Northbound trading for the Funds. In addition, the Fund's title or interests in, and entitlements to Bond Connect Securities (whether legal, equitable or otherwise) will be subject to applicable requirements, including laws relating to any disclosure of interest requirement or foreign bondholding restriction, if any. It is uncertain whether the Chinese courts would recognise the ownership interest of the investors to allow them standing to take legal action against the Chinese entities in case disputes arise.

#### *Not protected by Investor Compensation Fund*

Investors should note that any trading under Bond Connect will not be covered by Hong Kong's Investor Compensation Fund nor the China Securities Investor Protection Fund and thus investors will not benefit from compensation under such schemes. Hong Kong's Investor Compensation Fund is established to pay compensation to investors of any nationality who suffer pecuniary losses as a result of default of a licensed intermediary or authorised financial institution in relation to exchange-traded products in Hong Kong. Examples of default are insolvency, in bankruptcy or winding up, breach of trust, defalcation, fraud, or misfeasance.

#### *Difference in trading day and trading hours*

Due to differences in public holiday between Hong Kong and PRC or other reasons such as adverse weather conditions, there may be a difference in trading days and trading hours on the CIBM and the CMU.

Bond Connect will thus only operate on days when both markets are open for trading and when banks in both markets are open on the corresponding settlement days. So, it is possible that there are occasions

when it is a normal trading day for the PRC markets, but it is not possible to carry out any Bond Connect Securities trading in Hong Kong.

#### *The recalling of eligible bond and trading restriction*

A bond may be recalled from the scope of eligible stocks for trading via Bond Connect for various reasons, and in such event the stock can only be sold but is restricted from being bought. This may affect the investment portfolio or strategies of the Investment Manager.

#### *Trading costs*

In addition to paying trading fees and other expenses in connection with Bond Connect Securities trading, the Funds carrying out Northbound trading via Bond Connect should also take note of any new portfolio fees, dividend tax and tax concerned with income arising from transfers which would be determined by the relevant authorities.

#### *Currency risks*

Northbound investments by Funds in the Bond Connect Securities will be traded and settled in Renminbi (RMB). If a Fund holds a class of shares denominated in a local currency other than RMB, the Fund will be exposed to currency risk if the Fund invests in a RMB product due to the need for the conversion of the local currency into RMB. During the conversion, the Fund will also incur currency conversion costs. Even if the price of the RMB asset remains the same when the Fund purchases it and when the Fund redeems / sells it, the Fund will still incur a loss when it converts the redemption / sale proceeds into local currency if RMB has depreciated.

#### *Risk of CMU default*

A failure or delay by the CMU in the performance of its obligations may result in a failure of settlement, or the loss, of Bond Connect Securities and/or monies in connection with them and the Fund and its investors may suffer losses as a result. Neither the Funds nor the Investment Manager shall be responsible or liable for any such losses.

#### *PRC tax risks in relation to Bond Connect Securities*

Unless a specific exemption or reduction is available, entities not tax resident in the PRC and not having a permanent establishment or place of business ("PE") in the PRC are subject to corporate income tax ("CIT") on a withholding basis generally at a rate of 10% on PRC passive sourced income, unless exempt, or the rate is reduced under specific PRC tax circulars or relevant double tax treaty. Interest derived from government bonds issued by the in-charge Finance Bureau of the State Council and/or local government bonds approved by the State Council are exempt from CIT. Further, on 22 November 2018, a three-year CIT exemption on bond interest income derived by foreign institutional investors from investments in PRC bond markets was confirmed from 7 November 2018 to 6 November 2021, pursuant to Caishui 2018 No.108.

Currently, there is no specific rule governing the taxation of capital gains derived by foreign investors trading PRC debt securities (including PRC debt securities traded through Bond Connect). Based on verbal comments from the PRC tax authorities, such gains should be non-PRC sourced income and thus would not be subject to PRC Withholding Income Tax ("WHT"). However, there are no written tax regulations issued by the PRC tax authorities to confirm that interpretation. As a matter of practice, the PRC tax authorities have not levied PRC WHT on capital gains realised by foreign investors from the trading of debt securities.



Pursuant to Caishui 2016 No.36, gains realised from trading of marketable securities and interest income would generally be subject to VAT at 6%, unless specifically exempted under laws and regulations. If VAT is applicable, there are also other surtaxes up to the rate of 12% that could apply. Pursuant to Caishui 2016 No.70, gains realised by recognised foreign investors from trading RMB-denominated debt securities in the PRC domestic bond market are exempted from VAT. Under the current VAT regime, interest received by foreign investors from government bonds and local government bonds are also exempt from VAT. According to Caishui 2018 No. 108, interest derived by foreign institutional investors from investment in bonds in PRC bond market is exempted from VAT from 7 November 2018 to 6 November 2021.

Investors should seek their own advice on their tax position with regard to their investment in a Fund with investments in China dealt via Bond Connect.

## **Stock Connect**

### *Risks linked with dealing in securities in China via Stock Connect*

Some of the Funds may seek exposure to stocks issued by companies listed on China stock exchanges via Stock Connect. Stock Connect is a mutual market access programme through which non-PRC investors can deal in select securities listed on a PRC stock exchange, currently the Shanghai Stock Exchange (“SSE”) and the Shenzhen Stock Exchange (“SZSE”), through a platform organised by the Hong Kong Stock Exchange (“SEHK”) via a broker in Hong Kong and PRC domestic investors can deal in select securities listed on the SEHK through a platform put in place by a PRC stock exchange, currently the SSE and SZSE.

China A Shares accessed via Stock Connect shall be referred to hereinafter as “Stock Connect Shares”.

Under the Stock Connect programme, investors in Hong Kong and Mainland China can trade and settle shares listed on the other market via the exchanges and clearing houses in both jurisdictions. Stock Connect is subject to quota limitations, which may restrict a Fund’s ability to deal via Stock Connect on a timely basis. This may impact that Fund’s ability to implement its investment strategy effectively. Currently, the scope of Stock Connect includes all constituent stocks of the SSE 180 Index, the SSE 380 Index, the SZSE Component Index, the SZSE Small/Mid Cap Innovation Index (with market capitalisation of RMB 6 billion or above) as well as all China A Shares dual-listed on either the SSE or SZSE and the SEHK, except for listed shares which are not traded in RMB and/or which are included under 'risk alert' or under delisting arrangements. Investors should note that a security may be recalled from the scope of Stock Connect as set out below. This may adversely affect the Fund’s ability to meet its investment objective, e.g., when it wishes to purchase a security which is recalled from the scope of Stock Connect.

Under Stock Connect, China A Shares listed companies and trading of China A Shares are subject to market rules and disclosure requirements of the China A Shares market. Any changes in laws, regulations and policies of the China A Shares market or rules in relation to Stock Connect may affect share prices. Foreign shareholding restrictions are also applicable to China A Shares.

The Investment Manager will be subject to restrictions on trading (including restriction on retention of proceeds) in China A Shares as a result of its interest in the China A Shares. The Investment Manager is solely responsible for compliance with all notifications, reports and relevant requirements in connection with their interests in China A Shares.

Under the current Mainland China rules, once an investor holds up to 5% of the shares of a company listed on either the SSE or SZSE, the investor is required to disclose his interest within three working days and during which he cannot trade the shares of that company. After that, the investor is also required to make disclosure within three working days every time a change in their shareholding reaches 5%. From the day the disclosure obligation arises to two working days after the disclosure is made, the investor may not trade the shares of that company. Overseas investors holding China A Shares via Stock Connect are subject to the following restrictions (i) shares held by a single foreign investor investing in a listed company must not exceed 10% of the total issued shares of such listed company; and (ii) total A shares held by all foreign investors (i.e., Hong Kong and overseas investors) who make investments in a listed company must not exceed 30% of the total issued shares of such listed company. If the aggregate foreign shareholding exceeds the 30% restriction, the foreign investors would be required to unwind their positions on the excessive shareholding according to a last-in-first-out basis within five trading days.

Trading in securities through the Stock Connect may be subject to clearing and settlement risk. If the PRC clearing house defaults on its obligation to deliver securities / make payment, the Fund may suffer delays in recovering its losses or may not be able to fully recover its losses.

According to existing Mainland China practices, the Fund as a beneficial owner of China A Shares traded via Stock Connect cannot appoint proxies to attend shareholders' meetings on its behalf.

#### *Beneficial owner of the Stock Connect Shares*

Stock Connect currently comprises a Northbound link, through which Hong Kong and overseas investors like the Company may purchase and hold Stock Connect Shares, and a Southbound link, through which investors in Mainland China may purchase and hold shares listed on the SEHK. The Company trades Stock Connect Shares through its broker affiliated to the Company sub-custodian who is an SEHK exchange participant. These Stock Connect Shares will be held following settlement by brokers or custodians as clearing participants in accounts in the Hong Kong Central Clearing and Settlement System ("CCASS") maintained by the Hong Kong Securities and Clearing Corporation Limited ("HKSCC") as central securities depository in Hong Kong and nominee holder. HKSCC in turn holds Stock Connect Shares of all its participants through a "single nominee omnibus securities account" in its name registered with ChinaClear, the central securities depository in Mainland China.

Because HKSCC is only a nominee holder and not the beneficial owner of Stock Connect Shares, in the unlikely event that HKSCC becomes subject to winding up proceedings in Hong Kong, investors should note that Stock Connect Shares will not be regarded as part of the general assets of HKSCC available for distribution to creditors even under Mainland China law. However, HKSCC will not be obliged to take any legal action or enter into court proceedings to enforce any rights on behalf of investors in Stock Connect Shares in Mainland China. Foreign Investors like the concerned Funds of the Company investing through the Stock Connect holding the Stock Connect Shares through HKSCC are the beneficial owners of the assets and are therefore eligible to exercise their rights through the nominee only.

#### *Not protected by Investor Compensation Fund*

Investors should note that any Northbound or Southbound trading under Stock Connect will not be covered by Hong Kong's Investor Compensation Fund, nor the China Securities Investor Protection Fund and thus investors will not benefit from compensation under such schemes.

Hong Kong's Investor Compensation Fund is established to pay compensation to investors of any nationality who suffer pecuniary losses as a result of default of a licensed intermediary or authorised financial institution in relation to exchange-traded products in Hong Kong. Examples of default are insolvency, in bankruptcy or winding up, breach of trust, defalcation, fraud, or misfeasance.

#### Quotas used up

Once the daily quota is used up, acceptance of the corresponding buy orders will also be immediately suspended and no further buy orders will be accepted for the remainder of the day. Buy orders which have been accepted will not be affected by the using up of the daily quota, while sell orders will be continued to be accepted.

#### Difference in trading day and trading hours

Due to differences in public holidays between Hong Kong and Mainland China or other reasons such as bad weather conditions, there may be a difference in trading days and trading hours in the markets in Hong Kong and Mainland China, Stock Connect will only operate on days when both markets are open for trading and when banks in both markets are open on the corresponding settlement days. So, it is possible that there are occasions when it is a normal trading day for the Mainland China market, but it is not possible to carry out any China A Shares trading in Hong Kong. There may be a risk of price fluctuations in China A Shares during the time when Stock Connect is not trading.

#### The recalling of eligible stocks and trading restrictions

A stock may be recalled from the scope of eligible stocks for trading via Stock Connect for various reasons, and in such event the stock can only be sold but is restricted from being bought. This may affect the investment portfolio or strategies of the Investment Manager.

Under Stock Connect, the Investment Manager will only be allowed to sell China A Shares but restricted from further buying if: (i) the China A Share subsequently ceases to be a constituent stock of the relevant indices; (ii) the China A Share is subsequently under "risk alert"; and/or (iii) the corresponding H share of the China A Share subsequently ceases to be traded on SEHK; and/or (iv) in respect of SZSE Shares only, such Shares, based on any subsequent periodic review, that are determined to have a market capitalisation of less than RMB 6 billion. Investors should also note that price fluctuation limits would be applicable to China A Shares.

#### Trading costs

In addition to paying trading fees and stamp duties in connection with China A Shares trading, the Funds carrying out trading Stock Connect Shares via Stock Connect may also be subject to new portfolio fees, dividend tax and tax concerned with income arising from stock transfers which would be determined by the relevant authorities.

#### *Risk of ChinaClear default*

ChinaClear has established a risk management framework and measures that are approved and supervised by the China Securities Regulatory Commission ("CSRC"). Pursuant to the General Rules of CCASS, if China Clear (as the host central counterparty) defaults, HKSCC will, in good faith, seek recovery of the outstanding Stock Connect securities and monies from ChinaClear through available legal channels and through ChinaClear's liquidation process, if applicable.

HKSCC will in turn distribute the Stock Connect securities and/or monies recovered to clearing participants on a pro-rata basis as prescribed by the relevant Stock Connect authorities. Although the likelihood of a default by ChinaClear is considered to be remote, the relevant Fund should be aware of this arrangement and of this potential exposure before engaging in trading Stock Connect Shares.

#### *Risk of HKSCC default*

A failure or delay by the HKSCC in the performance of its obligations may result in a failure of settlement, or the loss, of Stock Connect securities and/or monies in connection with them and the Company and its investors may suffer losses as a result. Neither the Company nor the Investment Manager shall be responsible or liable for any such losses.

#### *Ownership of Stock Connect Shares*

Stock Connect Shares are uncertificated and are held by HKSCC for its account holders. Physical deposit and withdrawal of Stock Connect Shares are not available currently under the Northbound trading for a Fund.

A Fund's title or interests in, and entitlements to Stock Connect Shares (whether legal, equitable or otherwise) will be subject to applicable requirements, including laws relating to any disclosure of interest requirement or foreign shareholding restriction. It is uncertain whether the Chinese courts would recognise the ownership interest of the investors to allow them standing to take legal action against the Chinese entities in case disputes arise. This is a complex area of law and investors should seek independent professional advice.

The above may not cover all risks related to Stock Connect and any above-mentioned laws, rules and regulations are subject to change.

#### *Tax factors relevant to Stock Connect*

Unless a specific exemption or reduction is available, entities not tax resident in the PRC and not having a PE in the PRC are subject to CIT on a withholding basis, generally at a rate of 10% on PRC passive sourced income, unless it is exempt or reduced under specific PRC tax circulars or relevant double tax treaty; therefore, dividends from A-shares traded on Stock Connect will be subject to a 10% PRC WHT at source. However, capital gains derived by foreign investors on the trading of A shares through Stock Connect have been exempted pursuant to Caishui 2014 No.81 and Caishui 2016 No.127 issued by the PRC tax authorities (the "Notices"), on a temporary basis and with no stated expiry date. It is possible that the Notices may be amended or withdrawn, in addition to other local tax regulation, at any time, and with potential retroactive effect, which may result in an impact to a Fund's Net Asset Value.

Pursuant to Caishui 2016 No.36 and Caishui 2016 No. 127, capital gains derived by foreign investors via Stock Connect are exempted from VAT. Dividend income or profit distributions on PRC equities are not included within the scope of VAT.

Investors should seek their own advice on their tax position with regard to their investment in a Fund with investments in China dealt via Stock Connect.

#### **Investment in Other Collective Investment Schemes**

A Fund may invest in other collective investment schemes. By investing in the relevant collective investment scheme, an investor will indirectly bear fees and expenses charged by the underlying

collective investment schemes in addition to the Fund's direct fees and expenses. Investments in other collective investment schemes shall be valued at the latest available net asset value per unit as published by the scheme; the latest bid prices as published by the scheme or if the scheme is listed on a market, the latest market prices as described in the section entitled **Issue and Redemption Prices/Calculation of Net Asset Value/ Valuation of Assets**. The Funds investing in other collective investment schemes may be subject to the risk that (i) the valuations of the Fund may not reflect the true value of the underlying collective investment schemes at a specific time which could result in significant losses or inaccurate pricing for the Fund and/or (ii) the valuation may not be available as at the relevant Valuation Point for the Fund. In such circumstances, the Investment Manager, with the consent of the Depository, may adjust the value of any such investment or permit such other method of valuation if the Investment Manager considers that such adjustment or other method of valuation is required to reflect more fairly the value of the underlying collective investment scheme.

### **Investment in India pursuant to a FPI license**

Where a Fund invests in Indian securities, it will be subject to certain Indian legal and regulatory requirements. Foreign investment in securities issued by Indian companies is regulated under the Foreign Exchange Management Act, 1999 ("FEMA") and by the Reserve Bank of India ("RBI"). The Foreign Exchange Management (Transfer or Issue of Security by a Person Resident outside India) Regulations, 2017 (the "Securities Regulations") issued under the FEMA establish various investment routes available to persons resident outside India (a "Non-Resident"), such as the Company and any of its Funds, seeking to make investments in securities issued by Indian companies. Any investment made by a Non-Resident shall be subject to the entry routes, sectoral caps or the investment limits, as the case may be, and the attendant conditionalities for such investment as laid down under the Securities Regulations. A Non-Resident may invest in an Indian company under the Foreign Direct Investment regime, Foreign Portfolio Investment regime and Foreign Venture Capital Investor regime.

The SEBI (Foreign Portfolio Investors) Regulations, 2019 ("FPI Regulations") were notified by the Securities and Exchange Board of India ("SEBI") on 23 September, 2019. A foreign portfolio investor ("FPI") has been defined as a person who satisfies the eligibility criteria prescribed under Regulation 4 of the FPI Regulations and has been registered under Chapter II of the FPI Regulations. FPIs are categorized into two categories as defined in the FPI Regulations, Category I and Category II. An entity proposing to register as an FPI must make an application to the designated depository participant in a form prescribed under the FPI Regulations for one of the categories mentioned above. An FPI is required to satisfy certain conditions in order to be eligible for a registration including good track record, professional competency and various criteria linked to residency status. An FPI registration once granted is permanent unless cancelled or suspended by SEBI or surrendered by the FPI. FPIs are obliged, under the terms of the undertakings and declarations made by them at the time of registration, to immediately notify the SEBI or the designated depository participant (as the case may be) of any change in the information provided in the application for registration. Failure by FPIs to adhere to relevant legislative provisions and regulatory rules and the FPI Regulations renders them liable for, amongst other matters, imposition of a penalty and suspension or cancellation of the certificate of registration.

Pursuant to the FPI Regulations, FPIs are generally permitted to invest in Indian securities without the prior approval of the RBI or SEBI. However, the total outstanding investments cannot exceed the FPI investment limits as prescribed by SEBI and RBI which may be revised from time to time (the "FPI Investment Limits"). Therefore, investments made by the relevant Fund in such instruments in India will be subject to such restrictions as may be notified by SEBI from time to time. The variability of such FPI Investment Limits may pose a risk to a Fund.

The Investment Manager will monitor the investments of the relevant Fund to ensure they do not exceed the FPI Investment Limits. In accordance with the requirements of SEBI and the RBI, the sub-custodian appointed by the Depository in India is also required to monitor that investments of the relevant Fund do not reach the FPI Investment Limits.

### **Investment in Russia**

If a Fund invests in Russia, investors should note that Russia has weaker corporate governance, auditing and financial reporting standards than those in developed markets, which could result in a less thorough understanding of the financial condition, results of operations and cash flow of companies in which the Funds invest. Accordingly, an investment in a Russian corporate will not afford the same level of investor protection as would apply in more developed jurisdictions.

### **Legal Risk**

The terms of derivatives, repurchase, reverse repurchase, buy-sell back, sell-buy back and securities lending transactions are generally established through negotiation between the parties to the agreements. While this provides more flexibility, these agreements may involve greater legal risk than exchange-traded instruments, which are standardised, as there may be a risk of loss if the agreement is deemed not to be legally enforceable or not documented correctly. There may also be a risk that the parties to the agreement may disagree as to the proper interpretation of its terms. If such a dispute occurs, the cost and unpredictability of the legal proceedings required for a Fund to enforce its contractual rights may lead the Fund to decide not to pursue its claims under the agreement. The Fund therefore assume the risk that it may be unable to obtain payments owed to it, and that those payments may be delayed or made only after the Fund has incurred the costs of litigation. Further, legal, tax and regulatory changes could occur which may adversely affect the Funds. The regulatory and tax environment governing these types of transactions is evolving, and changes in the regulation or taxation may adversely affect the value of such transactions entered into by the Funds and the Funds' ability to pursue their trading strategies.

### **LIBOR Transition and Associated Risk**

A Fund may invest in debt securities, derivatives or other financial instruments that utilize the London Interbank Offered Rate, or "LIBOR," as a "benchmark" or "reference rate" for various interest rate calculations. The United Kingdom Financial Conduct Authority (the "FCA"), which regulates LIBOR, has announced that certain LIBOR benchmarks will cease to be published at the end of 2021. Although widely used LIBOR rates are intended to be published until June 2023, banks are strongly encouraged to cease entering into agreements with counterparties referencing LIBOR by the end of 2021. Although financial regulators and industry working groups have suggested alternative reference rates, such as the European Interbank Offer Rate, the Sterling Overnight Interbank Average Rate and the Secured Overnight Financing Rate, global consensus on alternative rates is lacking and the process for amending existing contracts or instruments to transition away from LIBOR is underway but remains incomplete. The elimination of LIBOR or changes to other reference rates or any other changes or reforms to the determination or supervision of reference rates could have an adverse impact on the market for, or value of, any securities or payments linked to those reference rates, which may adversely affect a Fund's performance and/or Net Asset Value. Uncertainty and risk also remain regarding the willingness and ability of issuers and lenders to include revised provisions in new and existing contracts or instruments. Consequently, the transition away from LIBOR to other reference rates may lead to increased volatility and illiquidity in markets that are tied to LIBOR, fluctuations in values of LIBOR-related investments or investments in issuers that utilize LIBOR, increased difficulty in borrowing or refinancing and diminished effectiveness of hedging strategies, potentially adversely affecting a Fund's performance. Furthermore, the risks associated with the expected discontinuation of LIBOR and transition may be

exacerbated if the work necessary to effect an orderly transition to an alternative reference rate is not completed in a timely manner. Because the usefulness of LIBOR as a benchmark could deteriorate during the transition period, these effects could occur prior to the end of 2021.

### **Liquidity**

Liquidity is an indicator of how easily an investment may be converted into cash. An investment may be less liquid if it is not widely traded or if there are restrictions imposed by the exchange where the trading takes place or by the issuer. The sale of any thinly traded or illiquid investments may be possible only at substantial discounts or at discounts to the values at which a Fund is carrying them. Adverse market conditions resulting from Force Majeure Events (as defined in this Prospectus) may also affect the liquidity of an investment due to increased market volatility, exchange trading suspensions and closures as well as other disruptions to markets and market operations, which may impact a Fund's ability to sell certain securities and/or complete redemptions. If a Fund is forced to sell thinly traded or illiquid securities in order to meet redemption requests and/or its ongoing objective, such sales may result in a reduction in the Fund's Net Asset Value.

### **Loans**

An investment in bank loans may be in the form of participations in loans or of assignments of all or a portion of loans from third parties. Participations and assignments involve additional risks, including the risk of non-payment of principal and interest by the borrower, the risk that any loan collateral may become impaired and, particularly where the borrower is in financial distress, that the investor may obtain less than the full value for the loan interests sold because the bank loans have become illiquid. Purchasers of bank loans depend primarily upon the creditworthiness of the borrower for payment of interest and repayment of principal. If scheduled interest or principal payments are not made, the value of the instrument may be adversely affected.

Interests in bank loans are also subject to additional liquidity risks. Bank loans are not currently listed on any securities exchange or automatic quotation system, but are traded by banks and other institutional investors engaged in loan syndication. As a result, secondary markets may be subject to irregular trading activity, wide bid/ask spreads and extended trade settlement periods. Consequently, the Fund may have difficulty disposing of assignments or participations in response to a specific economic event such as deterioration in the creditworthiness of the borrower, which can result in a loss. In such market situations, it may be more difficult for a value to be assigned to bank loans for the purposes of calculating a Fund's Net Asset Value.

### **Long-Short Strategy**

Some Funds may employ long-short strategies. Long-short strategies generally seek to generate capital appreciation through the establishment of both long and short positions (through the use of financial derivative instruments) by purchasing perceived undervalued securities and selling perceived overvalued securities to generate returns and to reduce a portion of general market risk. If the analysis is incorrect or based on inaccurate information, these investments may result in significant losses to a Fund when the long and short sides of the portfolio both result in losses.

### **Management of a terminating Fund**

Where the decision is taken to terminate a Fund, this is likely to have an impact on the manner in which the assets of the Fund are managed until, and subsequent to, the date of termination. In order to facilitate an orderly termination, the Investment Manager may need to sell assets or close out positions

at less favourable prices or terms and/or may need to hold a larger amount of cash and for a different period than would be the case if the Fund was continuing.

## **Market**

The success of any investment activity is affected by general economic, social, political and regulatory conditions which affect the level and volatility of prices as well as the liquidity of the markets. The prices of many securities and derivative instruments are highly volatile. The prices of investments and the income from them, and therefore the value of, and income from, Shares can fall as well as rise. The price movements of the instruments which a Fund will acquire or sell are influenced by, among other things, interest rates, changing supply and demand relationships, trade, fiscal, monetary and exchange control programs and policies of governments, and national and international political and economic events. Governments from time to time intervene, directly and by regulation, in certain markets, particularly those in currencies and interest rates, disrupting strategies focusing on these sectors.

The profitability of a Fund's investment strategy depends to a great extent upon the Investment Manager's ability to correctly assess and combine the performance characteristics of a Fund's various underlying investment approaches. There can be no assurance that the Investment Manager will be able to accurately predict performance characteristics. At times, various markets experience great volatility and unpredictability. With respect to the investment strategy utilised by a Fund, there is always some, and occasionally a significant, degree of market risk. Although the Management Company employs risk management tools, it is possible that simultaneous losses could occur in more than one of the Fund's alpha sources, resulting in magnified losses to the Fund.

Force Majeure Events (as defined in this Prospectus) may disrupt or adversely impact the Investment Manager's ability to effectively manage a Fund or meet its investment objective, including in circumstances which affect the availability of personnel within the Management Company or Investment Manager who play an integral role in the management of the Fund.

## **Model and Data Reliability Risk**

The Investment Manager may use recommendations generated by proprietary quantitative analytical models. When executing an investment strategy using quantitative models, securities or other financial instruments selected can perform differently than expected, or from the market as a whole, as a result of a model's component factors, the weight placed on each factor, changes from the factors' historical trends, and technical issues in the construction, implementation and maintenance of the models (e.g., data problems, software issues, etc.).

Quantitative modelling is a very complex process involving numerous data points and settings encoded in computer software, and the Investment Manager and its affiliates review these codes and the various components to the models with a view to ensuring that they are appropriately adapted and calibrated to reflect the Investment Manager's views as to the potential implications of evolving external events and factors, including constantly changing economic, financial market and other conditions. This process involves the exercise of judgments and a number of inherent uncertainties. The Investment Manager's views, including those related to the optimal configuration, calibration and adaptation of the models, may change over time depending on evolving circumstances, on information that becomes available to the Investment Manager and its affiliates, and on other factors.

Although the Investment Manager attempts to ensure that the models are appropriately developed, operated and implemented, sub-optimal calibrations of the models and similar issues may arise from time to time, and neither the Investment Manager nor any of its affiliates can guarantee that the models



are in an optimal state of calibration and configuration at all times. Further, inadvertent human errors, trading errors, software development and implementation errors, and other types of errors are an inherent risk in complex quantitative investment management processes of the type the Investment Manager employs. Although the Investment Manager's policy is to promptly address any such errors when identified, there can be no guarantee that the overall investment process will be without error or that it will produce the desired results.

### **New Taiwan Dollar Repatriation Risk**

The exchange rate used for converting principals and/or profits denominated in New Taiwan dollar back to the Base Currency of a relevant Fund and repatriating out of Taiwan will be determined based on market rates on the day the currency is converted which is typically after the Settlement Date. In case of redemption of Shares, the valuation date for the redeeming Shareholder will precede the conversion date by several days, which will expose the remaining Shareholders of the relevant Fund to currency risk and potential losses in case of depreciation of the New Taiwan dollar between the valuation date and the conversion date.

### **Omnibus Cash Subscriptions, Redemptions and Distributions Account**

The Company will operate an umbrella cash account in the name of the Company which shall be designated in different currencies into which subscription monies received from subscribers of all of the Funds and redemption and distribution monies due to Shareholder and/or former Shareholders who have redeemed Shares in the Funds pending payment to them shall be placed (“Omnibus Cash Subscriptions, Redemptions and Distributions Account”). All subscriptions, redemptions and distributions payable to or from the relevant Fund will be channelled and managed through the Omnibus Cash Subscriptions, Redemptions and Distributions Account and no such account shall be operated at the level of each individual Fund. The Omnibus Cash Subscriptions, Redemptions and Distributions Account shall be operated in accordance with the provisions of the Articles of Association. On issue of shares in relation to a subscription and/or on cancellation of shares relating to a redemption, the individual Fund will record that net monies are due from/to the Omnibus Cash Subscriptions, Redemptions and Distributions Account. On settlement of the subscriptions or redemptions, net monies will be transferred from/to the Omnibus Cash Subscriptions, Redemptions and Distributions Account to/from the relevant Fund.

Subscription monies received in respect of a subscription in a Fund in advance of the issue of Shares will be held in the Omnibus Cash Subscriptions, Redemptions and Distributions Account in the name of the Company and will be treated as an asset of the Company. Subscribers will be unsecured creditors of the Umbrella Fund with respect to the amount subscribed and held by the Company until Shares are issued. As such, subscribers will not benefit from any appreciation in the Net Asset Value of the relevant Fund or any other Shareholder rights (including distribution entitlement) until such time as Shares are issued. In the event of an insolvency of the Fund or the Company, there is no guarantee that the Fund or Company will have sufficient funds to pay unsecured creditors in full. Any payment in respect of subscription monies made in advance of the issue of Shares by any subscriber is at such subscriber's own risk.

Payment of redemption proceeds and distributions in respect of a particular Fund is subject to receipt by the Transfer Agent of the original Account Opening Agreement and compliance with all requirements of opening and maintaining a shareholder account including but not limited to compliance with all money laundering prevention checks. Notwithstanding this, redeeming Shareholders will cease to be Shareholders, with regard to the redeemed Shares, and will be unsecured creditors of the particular Fund from the relevant Dealing Day. Pending redemptions and distributions

(including blocked redemptions or distributions) will, pending payment to the relevant Shareholder, be held in the Omnibus Cash Subscriptions, Redemptions and Distributions Account in the name of the Company. Redeeming Shareholders and Shareholders entitled to such distributions will be unsecured creditors of the relevant Fund, and will not benefit from any appreciation in the Net Asset Value of the Fund or any other Shareholder rights (including further distribution entitlement), with respect to the redemption or distribution amount held in the Omnibus Cash Subscriptions and Redemptions Account. In the event of an insolvency of the relevant Fund or the Company, there is no guarantee that the Fund or the Company will have sufficient funds to pay unsecured creditors in full. Redeeming Shareholders and Shareholders entitled to distributions should ensure that any outstanding documentation and information is provided to the Transfer Agent promptly. Failure to do so is at such Shareholder's own risk.

In the event of the insolvency of another Fund of the Company (the "Insolvent Fund"), recovery of any amounts held in the Omnibus Cash Subscriptions, Redemptions and Distributions Account to which another Fund is entitled (the "Entitled Fund"), but which may have transferred to the Insolvent Fund as a result of the operation of the Omnibus Cash Subscriptions, Redemptions and Distributions Account, will be subject to the principles of Irish insolvency law and the terms of the operational procedures for the Omnibus Cash Subscriptions, Redemptions and Distributions Account. There may be delays in effecting and/or disputes as to the recovery of such amounts, and the Insolvent Fund may have insufficient funds to repay amounts due to the Entitled Fund.

### **Operational Risk**

The Funds are subject to the impact of breakdowns in systems, internal procedures or human error of the Management Company or any of its delegates or any of the Company's or Management Company's service providers, counterparties or the markets in which the Company trades.

### **Real Estate Investment Trusts ("REITs")**

A Fund may invest in real estate securities, including REITs. REITs in which a Fund may invest may be affected by changes in underlying real estate values, which may have an exaggerated effect to the extent that REITs in which a Fund invests may concentrate investments in particular geographic regions or property types. Additionally, rising interest rates may cause investors in REITs to demand a higher annual yield from future distributions, which may in turn decrease market prices for equity securities issued by REITs. Rising interest rates also generally increase the costs of obtaining financing, which could cause the value of a Fund's investments to decline. During periods of declining interest rates, certain mortgage REITs may hold mortgages that the mortgagors elect to prepay, which prepayment may diminish the yield on securities issued by such mortgage REITs. In addition, mortgage REITs may be affected by the ability of borrowers to repay when due the debt extended by the REIT and equity REITs may be affected by the ability of tenants to pay rent.

Certain REITs have relatively small market capitalisations, which may tend to increase the volatility of the market price of securities issued by such REITs. Furthermore, REITs are dependent upon specialised management skills, have limited diversification and are, therefore, subject to risks inherent in operating and financing a limited number of projects. REITs depend generally on their ability to generate cash flow to make distributions to investors.

### **Redemptions by other Shareholders**

A redemption of Shares in a Fund by one or more Shareholders may have an adverse impact on remaining Shareholders, particularly where a large proportion of the Shares in a Fund are held by a small number of Shareholders. This may require the Investment Manager to dispose of investments at

sub-optimal prices or market conditions in order to satisfy the redemption requests. There is also a risk that large redemptions may reduce the assets of the Fund to below a level at which the Fund can be considered viable and this may result in the Directors making a decision to terminate the Fund. Conversely, redeeming Shareholders may benefit from the sale of more liquid securities or easier to sell investments and/or may not fully participate in the costs of termination of the relevant Fund. The Investment Manager will seek to mitigate this risk by requiring that actual realisation prices of investments, realisation expenses and liquidation costs are taken into account when calculating the Fund's Net Asset Value, but this cannot be guaranteed.

### **Reliance on the Investment Manager**

The profitability of a significant portion of a Fund's investment programme will depend upon the Investment Manager correctly assessing future price movements in securities. There can be no assurance that the Investment Manager will be able accurately to predict these price movements, even during market periods which are favourable to most other managers. Each strategy selected for a Fund will be unlikely to achieve its objectives under certain market conditions which may prevail for substantial periods of time after a Fund begins operating or allocates assets to a particular strategy.

The success of the Investment Manager in the past is not necessarily a reliable indicator of its prospects for future profitability. Speculative trading and investment strategies involve substantial risks, and the outcomes are uncertain.

Force Majeure Events (as defined in this Prospectus) may disrupt or adversely impact the Investment Manager's ability to effectively manage a Fund or meet its investment objective, including in circumstances which affect the availability of personnel within the Investment Manager who play an integral role in the management of the Fund.

### **Repurchase Agreements**

A Fund may engage in repurchase agreements with banks or broker-dealers subject to the conditions and limits set out in the Central Bank's UCITS Regulations. A repurchase agreement is an investment in which the relevant Fund sells ownership of securities and agrees to repurchase the securities at a future time and set price. Repurchase agreements involve certain risks in the event of default by the other party.

In the event the buyer of the securities files for bankruptcy or becomes insolvent, the relevant Fund's use of the proceeds of the agreement may be restricted pending the close out and set off process under the repurchase agreement, including the valuation of the securities held by the other party as collateral.

A Fund may engage in sell-buy back agreements which operate in a similar way and are subject to the same risks as repurchase agreements.

### **Reverse Repurchase Agreements**

A Fund may enter into reverse repurchase agreements with banks or broker-dealers subject to the conditions and limits set out in the Central Bank's UCITS Regulations. Reverse repurchase agreements involve a purchase by the relevant Fund of securities concurrently with an agreement by the seller to repurchase the same securities at a later date at a fixed price.

In the event of the bankruptcy or other default of the seller, the relevant Fund could experience both delays in liquidating the underlying securities and losses, including (i) possible decline in the value of

the underlying security during the period while it seeks to enforce its rights thereto; (ii) possible lack of access to income on the underlying security during this period; and (iii) expenses of enforcing its rights.

A Fund may engage in buy-sell back agreements which operate in a similar way and are subject to the same risks as reverse repurchase agreements.

### **Securities Lending**

Where a Fund enters into securities lending arrangements there are risks in the exposure to market movements on the value of collateral if the counterparty defaults and recourse has to be had to collateral, or if there is fraud or negligence on the part of the Depository, the Management Company or its delegates or a lending agent. In addition there is an operational risk associated with marking to market daily valuations and there are the potential stability risks of providers of collateral. The principal risk in such securities lending arrangements is the insolvency of the counterparty. In this event the Company could experience delays in recovering its securities and such event could possibly result in capital losses.

### **Structured Notes**

Structured Notes are used to gain access to certain markets where direct investment may not be possible. Structured Notes are securities issued by a financial institution or special purpose entity, the performance of which depends on the performance of a corresponding asset. Typically the redemptions or repayment proceeds from the Structured Notes replicate the underlying asset. However, such Structured Notes may embed a derivative such as an option, swap, forward or future as described in the section entitled **Types and Description of FDI's**, which has the effect of adjusting the proceeds received. As a result, the note's coupon, average life, and/or redemption values can become exposed to the forward movement in various indices, equity prices, foreign exchange rates or mortgage backed security prepayment speeds. Leverage is created as the payment of a low purchase price can provide a Fund with a larger exposure than its outlay and a small change in the price of the underlying asset can produce a disproportionately larger profit or loss. Structured Notes are generally subject to the same risks as direct holdings of securities of foreign issuers. Moreover, Structured Notes are also subject to the default risk of the issuer of the Structured Notes. Structured Notes are also subject to the liquidity risks.

### **Environmental, Social and Governance and Sustainable Investment**

The application of environmental, social and governance ("ESG") or sustainability considerations in a Fund's investment policy may affect the type and number of securities in which the Fund may invest, and as a result, at times, those Funds may produce different returns or more modest gains than funds that are not subject to such considerations. For example, a Fund may forgo opportunities to gain exposure to certain companies, industries, sectors or countries and it may choose to sell a security when it might otherwise be disadvantageous to do so. ESG considerations may cause a Fund's industry allocation to deviate from that of funds without these considerations and of benchmarks which are relevant for the Fund. Furthermore, ESG considerations are subjective and it is therefore possible that an investment may not perform in a way that an investor considers to be sustainable or responsible, even though it has been selected in accordance with the ESG criteria applied in the portfolio construction process for the relevant Fund.

### **Sustainability Risks**

Sustainability Risks can have a material impact on the Fund and its investments. The Investment Manager incorporates Sustainability Risk into its fundamental research and investment decision-making process. This may manifest itself in a number of ways, such as within the investment thesis or portfolio weighting for a particular security, or within the Investment Manager's company or issuer engagement efforts. The Investment Manager has access to a wide variety of both external and proprietary ESG research to help evaluate a company's or issuer's risk and return potential and determines the extent to which individual Sustainability Risks are considered (if at all) as part of its fundamental analysis of an investment or the Fund's overall investment strategy.

All Funds are exposed to Sustainability Risks to a varying degree. Where some Sustainability Risks are most frequently relevant to the investment process of a specific Fund, those are disclosed in the relevant Fund's supplement.

Unless otherwise provided for in the relevant Supplement for a Fund, as from the date of this Prospectus, each Fund is broadly diversified and the Investment Manager does not anticipate that any single Sustainability Risk will materially drive a negative financial impact on the value of the Fund. Sustainability Risks may change over time and there is no guarantee that the Investment Manager's approach to Sustainability Risk will limit or prevent losses from arising.

## **Environmental**

### *Transition Risks from Climate Change*

Many economic sectors, regions and/or jurisdictions, including those in which a Fund may invest, are currently and/or in the future may be, subject to a general transition to a greener, lower carbon and less polluting economic model. Drivers of this transition include governmental and/or regulatory intervention, evolving consumer preferences and/or the influence of non-governmental organisations and special interest groups.

Market mechanisms could also threaten the business models and cost structures of carbon-intensive industries and the financial firms that back them. For example, companies with higher risk of reduced earnings and business disruption from a low-carbon transition may be unable to meet their loan obligations, and the value the company/its collateral could decrease. These companies could also be denied insurance coverage of secured assets. On the investment side, as the market appreciates tightening regulation and accounts for higher carbon prices, repricing of carbon-intensive sectors occurs, reducing the value of these securities. A growing subset of investors willing to implement divestment could also reduce liquidity for certain high-carbon companies. As carbon pricing continues to be a mechanism through which various policymakers seek to mitigate climate change, companies may be impacted in different ways based on their sectors and region of operations. Further, businesses which are in compliance with current measures may suffer claims, penalties and other liabilities in respect of alleged prior failings. Any of the foregoing may result in a material loss in value of an investment linked to such businesses. As regulators increasingly focus on climate-related financial risks, climate change scenarios could become part of regular stress testing. If this happens banks with greater exposure to fossil fuel companies could end up shorter on capital under these scenarios and credit spreads could widen as a result. Litigation risks are also growing for carbon extractors, high-emitting companies, and those resisting the low-carbon transition. The same is true for companies that may have misled consumers and investors.

Sectors, regions, businesses and technologies which are carbon-intensive, higher polluting or otherwise cause a material adverse impact on Sustainability Factors may suffer from a significant fall in demand and/or obsolescence, resulting in stranded assets the value of which is significantly reduced or entirely

lost ahead of their anticipated useful life. Attempts by sectors, regions, businesses and technologies to adapt so as to reduce their impact on Sustainability Factors may not be successful, may result in significant costs being incurred, and future ongoing profitability may be materially reduced. In addition, significant technological innovation is required to achieve a low-carbon economy, and this necessitates significant capital investments by companies that must transition their business models. For example, energy and utilities companies may need to embrace the energy transition to lower their cost of capital, maintain their license to operate, and/or align their production with shifting demand for lower-carbon sources of energy. The evolution of emerging and low-carbon technologies may also be disruptive to certain incumbent industries.

### *Physical Risks from Climate Change*

Certain Funds might also have exposure to potential physical risks resulting from climate change for example the tail risk of significant damage due to increasing erratic and potentially catastrophic weather phenomena such as droughts, wildfires, flooding and heavy precipitations, heat/coldwaves, landslides or storms. As the frequency of extreme weather events increases, a Fund's assets exposure to these events increases too.

Alongside these acute physical risks Funds might also be exposed to the chronic physical risks stemming from climate change, including amongst others, coastal flooding, coastal erosion, soil degradation and erosion, water stress, changing temperatures or changing wind or precipitation patterns.

Such risks may arise in respect of a company itself, its affiliates or in its supply chain and/or apply to a particular economic sector, geographical or political region.

Other Environmental risks include:

- a) Natural resources: the relationship between businesses and natural resources is becoming increasingly important due to the scarcity of fresh water, loss of biodiversity and risks arising from land use. Water is critical to agricultural, industrial, domestic, energy generation, recreational and environmental activities. Reduced supply or allocation of water and/or increased cost in supply and controls over its use may adversely impact the operations, revenue and expenses of certain industries in which a Fund may invest. Biodiversity underpins ecosystem services such as food, clean water, genetic resources, flood protection, nutrient cycling and climate regulation. A continued loss of biodiversity may adversely affect the operations, revenue and expenses of certain industries in which a Fund may invest, such as land users and marine industries, agriculture, the extractives industries (cement and aggregates, oil, gas and mining) forestry and tourism. Land use and land use management practices have a major impact on natural resources.
- b) Pollution and waste: pollution adversely affects the environment and may for example, result in negative impact on human health, damage to ecosystems and biodiversity and reduced crop harvests. Measures introduced by governments or regulators to reduce pollution and control and reduce waste may adversely impact the operations, revenue and expenses of industries in which a Fund may invest.

### *Social*

Social risks include:

- a) Internal social factors: human capital considerations such as human rights violations, lack of access to clean water, food and sanitary living environment, human trafficking, modern slavery / forced labour, inadequate health and safety, discrimination, breaches of employee rights and use of child labour which may, in particular, give rise to negative consumer sentiment, fines and other regulatory sanctions and/or investigations and litigation. The profitability of a business reliant on adverse treatment of human capital may appear materially higher than if appropriate practices were followed.
- b) External social factors: for example, restrictions on or abuse of the rights of consumers including consumer personal data, management of product safety, quality and liability, relationships with and infringements of rights of local communities and indigenous populations may, in particular, give rise to negative consumer sentiment, fines and other regulatory sanctions and/or investigations and litigation.
- c) Social “megatrends”: trends such as globalisation, automation and the use of artificial intelligence in manufacturing and service sectors, inequality and wealth creation, digital disruption and social media, changes to work, leisure time and education, changes to family structures and individual rights and responsibilities of family members, changing demographics including health and longevity and urbanisation are all examples of social trends that can have a material impact on businesses, sectors, geographical regions and the vulnerability and inability to adapt or take advantage of such trends may result in a material negative impact on a Fund’s investments.

### *Governance*

Governance risks include:

- a) Lack of diversity at board or governing body level: the absence of a diverse and relevant skillset within a board or governing body may result in less well informed decisions being made without appropriate debate and an increased risk of “group think”. Further, the absence of an independent chairperson of the board, particularly where such role is combined with the role of chief executive officer, may lead to a concentration of powers and hamper the board’s ability to exercise its oversight responsibilities, challenge and discuss strategic planning and performance, input on issues such as succession planning and executive remuneration and otherwise set the board’s agenda.
- b) Inadequate external or internal audit: ineffective or otherwise inadequate internal and external audit functions may increase the likelihood that fraud and other issues within a company are not detected and/or that material information used as part of a company’s valuation and/or the Investment Manager’s investment decision making is inaccurate.
- c) Infringement or curtailment of rights of (minority) shareholders: the extent to which rights of shareholders, and in particular minority shareholders (which may include a Fund) are appropriately respected within a company’s formal decision making process may have an impact on the extent to which the company is managed in the best interest of its shareholders as a whole (rather than, for example, a small number of dominant shareholders) and therefore the value of an investment in it.
- d) Bribery and corruption: the effectiveness of a company’s controls to detect and prevent bribery and corruption both within the company and its governing body and also its suppliers,

contractors and sub-contractors may have an impact on the extent to which a company is operated in furtherance of its business objectives.

- e) Lack of scrutiny of executive pay: failure to align levels of executive pay with performance and long-term corporate strategy in order to protect and create value may result in executives failing to act in the long-term interest of the company.
- f) Poor safeguards on personal data / IT security (of employees and/or customers): the effectiveness of measures taken to protect personal data of employees and customers and, more broadly, IT and cyber security will affect a company's susceptibility to inadvertent data breaches and its resilience to "hacking".
- g) The absence of appropriate and effective safeguards for employment related risks: discriminatory employment practices, workplace harassment, discrimination and bullying, respect for rights of collective bargaining or trade unions, the health and safety of the workforce, protection for whistle-blowers and non-compliance with minimum wage or (where appropriate) living wage requirements may ultimately reduce the talent pool available to the company, the wellbeing, productivity and overall quality of its workforce and may lead to increased employment and other business costs.

For more information on Wellington Management Group's Global Governance Assessment Policy, which sets out the framework for evaluating the governance practices of the companies it invests in, including additional information about available research, please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).

### **Tax and Other Regulatory Considerations**

Certain prospective Shareholders may be subject to laws, rules and regulations which may regulate their participation in the Fund or their engaging directly, or indirectly through an investment in the Fund, in investment strategies of the types which the Fund may utilise from time to time (e.g., short selling). Prospective Shareholders should consult with their own advisors as to the advisability and tax consequences of an investment in the Fund. Prospective Shareholders should also be aware that the tax treatment of the Fund, as well as their investment, may change over time.

### **Technology and Data**

The Management Company and its service providers rely heavily on the use of technology, including proprietary and third-party software and data, to run substantially all aspects of the management of the Fund. For example, the majority of trade instructions are entered by Fund managers and executed by traders utilising electronic systems, some of the Funds use quantitative equity models to assess the attractiveness of investments or Fund construction models to generate suggested trades or investment weightings. Compliance with investment guidelines is monitored utilising electronic systems and data provided by various proprietary and third-party sources.

Processes reasonably designed for developing, selecting and overseeing these technology systems and databases, in particular controls designed to assure that technology systems are sound and the systems suppliers that are relied on are reputable and competent and risk based controls around the use of data which include diligence of third party service providers, monitoring data sources for inaccurate or missing data, and escalation procedures may not be successful in completely mitigating the risk of system defects and/or inaccurate or missing data.



Systems flaws and inaccurate data may go undetected for long periods of time, or avoid detection altogether. These issues could have a negative (or positive) impact on the investment performance of a Fund.

### **United Kingdom left the European Union**

The United Kingdom's referendum held on 23 June 2016 resulted in a majority voting in favour of the United Kingdom ("UK") leaving the EU. On 23 January 2020, the European Union (Withdrawal Agreement) Act 2020 (the "Withdrawal Act") received the royal assent by the Queen, thereby approving the United Kingdom's exit from the EU which occurred on 31 January 2020, and the transition period ended on 31 December 2020.

The Funds may be negatively impacted by changes in law and tax treatment resulting from the UK's departure particularly as regards any UK domiciled investments held by the Fund in question, following the UK's exit from the EU. In addition, UK domiciled investors in the Funds may be impacted by changes in law, particularly as regards UK taxation of their investment in a Fund, resulting from the UK's departure from the EU.

There is likely to remain a degree of continued market uncertainty regarding this exit process which may also negatively impact the value of investments held by the Funds.

Ireland will remain a member of the EU and the Funds remain EU regulated UCITS that can avail of passporting rights under the UCITS Directive and the Regulations to market and sell shares in the Funds in the EU, subject to complying with the terms of the UCITS Directive and the Regulations.

### **Valuation**

The Administrator may consult the Investment Manager with respect to the valuation of investments which are (i) unlisted, or (ii) listed or traded on a Market but where the market price is unrepresentative or not available. There is a possible conflict of interest because of an Investment Manager's role in determining the valuation of a Fund's investments and the fact that the Investment Manager receives a fee which increases as the value of the Fund increases. Post purchase, some investments may become illiquid or fair valued, or remain liquid and have values that vary significantly between different trading venues or exchanges due to market events and/or restrictions. In these instances, a security may be valued at close to zero, and then subsequently become more liquid or start trading at a higher price as market events settle down and/or restrictions ease. Depending on timing, redeeming shareholders may not realize any value on those securities and subscribing shareholders might dilute the initial exposure of the fund towards those securities.

### **144A Securities**

Certain Funds may purchase Rule 144A securities, which are securities that are not registered under the 1933 Act, but that can be sold to certain institutional buyers in accordance with Rule 144A under the 1933 Act. Rule 144A Securities may involve a high degree of business and financial risk and may result in substantial losses. These securities may be less liquid than publicly traded securities, and a Fund may take longer to liquidate these positions than would be the case for publicly traded securities. Although these securities may be resold in privately negotiated transactions, the prices realised from these sales could be less than those originally paid by a Fund. Further, companies whose securities are not publicly traded may not be subject to disclosure and other investor protection requirements that would be applicable if their securities were publicly traded.

**The Net Asset Value of the Shares will fluctuate and may be worth more or less than the acquisition price when redeemed or sold. There is no assurance that a Fund's investment objective will be achieved.**

## DEALING IN SHARES

### Available Share Classes

Shares in each Fund may be issued with different characteristics relating to (i) target investor profile, (ii) currency of denomination, (iii) any related hedging strategy and (iv) distribution policy. Complete details of the different Share Class characteristics available for a Fund are set out in Appendix III and in each Supplement.

Class S Shares are available only for Institutional Investors.

Class N Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

Class D Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders. Class D Shares will be assigned a distribution fee as described under **Charges and Expenses**.

### Other Share Classes

Some of the Share Classes listed below may be available in certain Funds. Details of these are set out in the relevant Supplement, as applicable.

Class G Shares (including the Class GN, Class GD and Class GR Shares) are reserved for existing Shareholders whose previous Shares have been changed, and serves as a "grandfathered" Class enabling the Shareholders to remain invested without undergoing those changes. This Share Class is closed to investors from outside the Class, and the Company also reserves the right to close the Class to additional subscriptions from existing G, GN, GD and GR Class Shareholders in any particular Fund. Class GD Shares will be assigned a distribution fee as described under **Charges and Expenses**.

Class NI and NR Shares are reserved for certain investors, acting as financial intermediaries on behalf of underlying beneficial holders.

Class E Shares are available at the discretion of the Company. These shares are available to certain investors until the total Net Asset Value of the relevant Fund reaches a pre-defined limit as stated in the relevant Supplement or subject to the discretion of the Company.

Class EN Shares are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for investors investing on their own account, who do not meet the criteria for Class S or E Shares. EN Shares are available until the total Net Asset Value of the relevant Fund reaches a pre-defined limit as stated in the relevant

Supplement or subject to the discretion of the Company. No distribution fee is paid in respect of the Class EN Shares.

Class ED Shares are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders. Class ED Shares will be assigned a distribution fee as described under **Charges and Expenses**. Class ED Shares are available until the total Net Asset Value of the relevant Fund reaches a pre-defined limit as stated in the relevant Supplement or subject to the discretion of the Company.

Class DL Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders. Class DL Shares will be assigned a distribution fee as described under **Charges and Expenses**.

Class T Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans). No distribution fee is paid in respect of Class T Shares. The fees payable in relation to investments in the Class T Shares will be agreed separately.

Class SB, SC and SP Shares are reserved for Institutional Investors.

Class TB and TC Shares are reserved for Institutional Investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

Class BN Shares are reserved exclusively for clients of a financial intermediary, approved by the Company, that hold the Shares on behalf of underlying beneficial holders. No distribution fee is paid in respect of Class BN Shares, instead a higher investment management fee relative to other Share Classes is applied, part of which is paid to the relevant intermediary holding these Share Classes to compensate them for distribution and/or shareholder services provided to underlying beneficial owners of these Shares. For further details of such rebate arrangements, please refer to the **Investment Management Fees** sub-section in the **Charges and Expenses** section.

Class UN Shares are reserved for certain investors, acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee. No distribution fee is paid in respect of the Class UN Shares.

In addition, Shares in each Fund may be denominated in either the Fund's Base Currency or in another Dealing Currency, they may be either hedged or unhedged and either Distributing Shares or Accumulating Shares. With respect to unhedged Share Classes not in Base Currency, a currency conversion at the prevailing spot currency exchange rate of the relevant Base Currency for the currency of the relevant Share Class will take place with respect to subscriptions, redemptions and distributions and the value of the unhedged Shares expressed in the Dealing Currency will be subject to exchange rate risk in relation to the Base Currency.

Additional Share Classes may be available in certain Funds. Details of these are set out in the relevant Supplement, as applicable.

## Application for Shares

It is intended that Shares normally will be issued on the Dealing Day for which an application is received in good order by the relevant Dealing Deadline. Subscription requests received after the relevant Dealing Deadline shall be treated as having been received by the following Dealing Deadline, unless otherwise determined by the Directors or the Management Company or its delegates.

Accounts must be opened by submission of an Account Opening Agreement sent by mail, via electronic medium (such as email) or by facsimile to the Transfer Agent to the relevant contact details indicated in the Investor Guide. If sent by facsimile, the original signed Account Opening Agreement (and supporting documentation in relation to money laundering prevention checks) must be promptly sent by courier or air mail to the Transfer Agent and no Shares will be issued until these documents have been received and the actual money laundering prevention checks have been completed. If sent using an electronic medium, the Account Opening Agreement (and supporting documentation in relation to money laundering prevention checks) must be signed utilising a valid form of electronic signature and transmitted using an acceptable electronic medium as outlined in the Investor Guide and at the discretion of the Management Company. Upon acceptance of the Account Opening Agreement by the Transfer Agent, applications for Shares should be made to the Transfer Agent as specified in the Investor Guide. Valid applications made in accordance with the requirements set out in the Investor Guide will be treated by the Company as definitive orders and will not be capable of withdrawal after acceptance by or on behalf of the Company. Full details on subscription and payment requirements are available from the Transfer Agent. In addition, prospective investors should consult the current version of the Investor Guide, which may be obtained from the Transfer Agent or the Investment Manager, for the current dealing procedures.

Payment is due in the relevant Dealing Currency on or before the Settlement Date. A Fund's current settlement cut-off times and policies are included in the Investor Guide. Payments made by the investors to the Company, or made by the Company to investors, in relation to subscriptions or redemptions under standard settlement terms are received into an omnibus account held in the name of the Company and therefore upon receipt are treated as assets of the Company. As assets of the Company such monies do not have the benefit of the protections afforded by the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Investment Firms) Regulations 2017 (S.I. 604 of 2017) (as may be amended from time to time). For further details see the Omnibus Cash Subscriptions, Redemptions and Distributions Account paragraph in the section entitled **Risk Factors**.

Subscriptions for Shares should be received in the relevant Dealing Currency. However, by agreement between the applicant, the Management Company and the Transfer Agent, alternative currencies can be facilitated but will be converted into the currency of the Class at the rate of exchange available to the Transfer Agent. The same logic will be applied to redemptions and exchange transactions. Any costs and risks of conversion shall be borne fully by the investor or Shareholder (as applicable), details of which are available on request. Payments relating to any instruction received to process an exchange of any Shares will be made directly between the relevant Funds in the currency of each relevant Share. Where a foreign exchange trade is required to facilitate this, such trade will be processed as described above. All related bank charges are to be borne by the investor or the Shareholder (as applicable).

Shares of each Class shall be, or were, offered at the Initial Issue Price set out in the relevant Supplement during the Initial Offer Period for such Class of Shares. Thereafter Shares of such Class will be available for subscription at the Net Asset Value per Share of the relevant Class.

The Minimum Initial Subscription, Minimum Subsequent Subscription and Minimum Holding Amounts for each Class are set out in the relevant Supplement. Such amounts and any other eligibility criteria applicable to the relevant Class of Shares may be waived by the Directors, Management Company or Investment Manager, at its discretion.

Payment by wire transfer should quote the information precisely as specified in the Investor Guide. Any charges incurred in making payment by wire transfer will be payable by the applicant.

Securities transactions may be made in respect of subscriptions prior to settlement, and as agreed in the Account Opening Agreement, investors will be liable for any interest, losses or other costs incurred as a result of failing to settle an order within the time frames agreed to in the Investor Guide. The Directors, Management Company or its delegate reserve the right to require other settlement procedures (such as shortened settlement period) for large orders or in other circumstances that, in the Investment Manager's judgment, present settlement risk.

The Directors may in their absolute discretion, provided that they are satisfied that no material prejudice would result to any existing Shareholders and subject to the provisions of the Companies Act 2014 (the **Companies Act**), allot Shares of any Class of a Fund against the vesting in the Company of investments which would form part of the assets of the relevant Fund. The number of Shares of a Fund to be issued in this way shall be the number which would on the day the investments are vested in the relevant Fund of the Company have been issued for cash against the payment of a sum equal to the value of the investments. The value of the investments to be vested shall be calculated on such basis as the Directors may decide and as described under the section entitled **Issue and Redemption Prices/Calculation of Net Asset Value/Valuation of Assets** below.

The Company may decline any application for Shares in whole or in part without assigning any reason therefor and will not accept an initial subscription for Shares of any amount (exclusive of the preliminary charge, if any) which is less than the Minimum Initial Subscription unless the Minimum Initial Subscription is waived by the Directors, Management Company or their delegates. In particular, the Directors may close any Share Class or Fund to additional investment on such terms as they determine if they believe any Fund has reached a size that could impact on the ability of the Fund to find suitable investments, and may reopen a Share Class or Fund without advance notice at any time. If an application is rejected, the Company, at the risk of the applicant, will return application monies or the balance thereof by wire transfer at the cost of the applicant, within five Business Days of the rejection. No interest will be paid on subscription amounts.

Applications for Shares must be made for specified amounts in value or specified numbers of Shares. Fractional shares of not less than 0.001 of a Share may be issued. Subscription monies representing smaller portions of Shares will not be returned to the applicant but will be retained as part of the assets of the relevant Fund. Shares will be issued in registered form. Written confirmations of entry in the register of Shareholders will be issued within five Business Days after the Dealing Day on which Shares are allotted and paid for.

The Account Opening Agreement contains certain conditions regarding the application procedure for Shares in the Company and certain indemnities in favour of the Company, the Management Company, the Investment Manager, the Administrator, the Transfer Agent, the Depository and the other Shareholders for any loss suffered by them as a result of such applicant or applicants acquiring or holding Shares in the Company.

Shares may not be issued or sold by the Company during any period when the calculation of the Net Asset Value of the relevant Fund is suspended in the manner described under the section entitled

**Suspension of Calculation of Net Asset Value** below. Applicants for Shares will be notified of such suspension and, unless withdrawn, their applications will be considered as at the next Dealing Day following the ending of such suspension.

### **Anti-Money Laundering**

The Company, Management Company and its agents have a responsibility to comply with all applicable laws and regulations designed to combat money laundering activity and terrorist financing. Applicants for Shares may be required to furnish independent documentary evidence of their identity, a permanent address and information relating to the source of the monies to be invested. In the event of delay or failure by the applicant for Shares to produce any information required for verification purposes, the Company, the Management Company or its duly authorised agents may refuse to accept the application or may refuse to process a redemption request until proper information has been provided.

To the extent that an investor is purchasing the Shares on behalf of, or as an intermediary for, one or more of its clients, the investor will represent and confirm that:

- (i) the purchase of such Shares shall be for the benefit of certain clients for whom the investor has an established relationship and investment discretion, or who have authorised this investment; and
- (ii) the investor has obtained and recorded evidence of the identity of its clients who have invested in the Company in accordance with applicable money laundering regulations and prudent due diligence procedures. The investor will inform the Management Company or its agents immediately in the event of any change in this internal procedure or in the event the investor uncovers additional information about a client that would make this representation no longer true.

Applicants and investors should note that pursuant to the European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019 (as may be amended from time to time), an investor may be required to disclose its ownership rights in the shares of each Fund and where such investor holds greater than 25% of the Shares of the Company, such investor's name shall be entered on a beneficial ownership register maintained by the Company or its delegates.

### **Redemption of Shares**

Requests for the redemption of Shares should be made to the Transfer Agent in accordance with the requirements set out in the Investor Guide and will be treated as definitive orders and requests received by or on behalf of the Company on or prior to the Dealing Deadline will normally be dealt with on the relevant Dealing Day. The Directors or the Management Company may at their discretion require greater notice to be given to the Transfer Agent in respect of redemption requests of a significant size so as to facilitate an orderly disposition of securities in the interests of the remaining Shareholders. Amendments to a Shareholder's registration details and payment instructions will only be effected on receipt of documentation duly verified by the Company, the Management Company or its agents in accordance with the documentation requirements set out in the Investor Guide. Any communication of amendments related to such items where the documentation has not been received and duly verified may delay the settlement of a redemption. Redemption requests received after the Dealing Deadline shall be treated as having been received by the following Dealing Deadline unless otherwise determined by the Directors or the Management Company or its delegates. A redemption request will not be capable of withdrawal after the relevant Dealing Deadline, unless such withdrawal is approved by the Directors or the Management Company, acting in their or its absolute discretion. The Company or the Management Company may, in its absolute discretion and subject to the prior approval of the

Depository, agree to designate additional Dealing Days and Valuation Points for the redemption of Shares relating to any Fund which has not designated every Business Day as a Dealing Day.

Payment of redemption proceeds will be made to the registered Shareholder or in favour of the joint registered Shareholders, as appropriate, unless the Transfer Agent is otherwise instructed in writing by the registered Shareholder or joint registered Shareholders. Payments pending distribution to investors from the Company in relation to redemptions are received into an omnibus account held in the name of the Company and therefore upon receipt are treated as assets of the Company. As assets of the Company such redemption monies do not have the benefit of the protections afforded by the Central Bank (Supervision and Enforcement) Act 2003 (Section 48(1)) Investor Money Regulations 2015 for Fund Service Providers (S.I. 105 of 2015) (as amended). For further details see the Omnibus Cash Subscriptions, Redemptions and Distributions Account paragraph in the section entitled **Risk Factors**.

The amount due on redemption of Shares will be paid by wire transfer at the Shareholder's expense or by negotiable instrument in the Dealing Currency of the relevant Class of Shares (or in such other currency as may be approved by the Directors from time to time) on or before the Settlement Date.

The Company is entitled to limit the number of Shares of any Fund redeemed on any Dealing Day to 10% of the total number of Shares of that Fund in issue. In this event, the limitation will apply pro rata so that all Shareholders wishing to have Shares of that Fund redeemed on that Dealing Day realise the same proportion of redeemed Shares. Shares not redeemed, but which would otherwise have been redeemed, will be carried forward for redemption on the next Dealing Day and will be dealt with on a pro rata basis with redemption requests received subsequently. If requests for redemption are so carried forward, the Transfer Agent will inform the Shareholders affected.

If a Shareholder submits a redemption request which would have the effect of reducing the value of the Shareholder's remaining holdings below the Minimum Holding Amount for the Fund, the Company may treat the redemption request as a request to redeem the Shareholder's entire holdings.

The Company may compulsorily redeem a Shareholder's holding in certain circumstances as detailed on page 2 of this Prospectus, including where it is less than the Minimum Holding Amount for the Fund or the relevant Share Class, or where the Shareholder no longer meets the eligibility requirements of the relevant Share Class.

The Articles contain special provisions with respect to a redemption request received from a Shareholder which would result in more than 5% of the Net Asset Value of Shares of any Fund being redeemed by the Company on any Dealing Day. In such a case, the Company may satisfy the redemption request in whole or in part by a distribution of investments of the relevant Fund in specie, provided that such a distribution would not be prejudicial to the interests of the remaining Shareholders of that Fund. The allocation of the investments of the relevant Fund is subject to the approval of the Depository. Where a Shareholder requesting such redemption receives notice of the Company's intention to elect to satisfy the redemption request by such a distribution of assets, the Shareholder may require that the Company, instead of transferring those assets, arrange for their sale and the payment of the net proceeds of sale to that Shareholder.

When a repurchase request has been submitted by an investor who is or is deemed to be or is acting on behalf of a Taxable Irish Person, the Company shall deduct from the repurchase proceeds an amount which is equal to the tax payable by the Company to the Revenue Commissioners in Ireland in respect of the relevant transaction.

The Company may redeem all the Shares of any Fund if, at any time after the initial issue of such Shares, the Net Asset Value of the relevant Fund is less than such amount as the Directors determine, in their sole discretion, is adequate to maintain a Fund of sufficient size to serve the best interests of its Shareholders.

### **Exchange of Shares**

Shareholders of each Share Class will be able to apply to exchange on any Dealing Day all or part of their holding of Shares of any Class (the "Source Class") for Shares of another Class which are being offered at that time whether in relation to the same Fund or in another Fund of the Company as specified in the Investor Guide (the "Target Class"), provided that all criteria for subscription into the Target Class have been met, by giving notice to the Transfer Agent on behalf of the Company on or prior to the Dealing Deadline for the relevant Dealing Day. The general provisions and procedures relating to redemptions will apply equally to exchanges. All exchanges will be treated as a redemption of the Shares of the Source Class and application of the net proceeds to the purchase of Shares of the Target Class, based upon the then current sales and redemption prices of Shares in each Fund. Exchange requests received after the relevant Dealing Deadline for either the Source Class or Target Class shall be treated as having been received by the following Dealing Deadline for both the Source Class and Target Class unless otherwise determined by the Directors or the Management Company or its delegates. There is presently no fee charged for any exchange. The Articles allow for an exchange fee of up to 1% of the total sales price of the Shares of the Target Class purchased to be charged, and the Directors reserve the right to impose such a fee, upon giving at least 30 days written notice to Shareholders. However, Shareholders may be charged an exchange fee by their financial adviser or intermediary. Where Shareholders are exchanging between D, DL, ED or GD Share Classes through a financial intermediary, an exchange fee of up to 1% of the amount of the Shares exchanged into another Share Class may be payable to the financial adviser or intermediary. Shareholders should consult their financial adviser or the intermediary about any such fees.

The Directors have power to effect a compulsory exchange of Shares of a Shareholder's holding between Share Classes in a Fund where it is considered in the sole discretion of the Directors to be in the interests of the relevant Shareholder or in circumstances where the Shareholder no longer meets the eligibility requirements for a Share Class, or where a distribution fee is payable to the Shareholder under the terms of the Share Class but the Shareholder is unable to accept such a fee due to commercial or regulatory constraints. Advance notice in writing will be given to the relevant Shareholders of the Directors' intention to effect a compulsory exchange of the Shareholder's holding between Share Classes in a Fund.

### **Market Timing**

The Company at its discretion, reserves the right to refuse to accept any application for initial or subsequent subscription or to compulsorily redeem Shares held by any Shareholder, without giving any reason where the Company suspects market timing. Without limiting the foregoing, and as further described below, the Company may not be used as a vehicle for frequent trading in response to short term market fluctuations (so called "market timing"). Accordingly, the Company may reject any subscriptions (or compulsorily redeem Shares) from any investor that it determines is engaged in market timing or other activity which it believes is harmful to the Company or any Fund. If a subscription is rejected, subscription proceeds will be returned without interest to the subscriber, as soon as practicable. There is no guarantee that the Company or its agents will be able to recognise Shareholders engaged in this activity or curtail their trading practices.



## **Excessive Trading Policies**

The Company emphasises that all investors and Shareholders are bound to place their subscription, redemption or exchange order(s) no later than the relevant Dealing Deadline for transactions in the Fund's Shares. Late trading is not accepted.

Excessive trading into and out of a Fund can disrupt portfolio investment strategies and increase the Fund's operating expenses. The Funds are not designed to accommodate excessive trading practices. The Directors reserve the right to restrict, reject or cancel purchase, redemption and exchange orders as described above, which represent, in their sole judgment, excessive trading.

Shareholders seeking to engage in excessive trading practices may deploy a variety of strategies to avoid detection, and there is no guarantee that the Company or its agents will be able to recognise such Shareholders or curtail their trading practices. The ability of the Company and its agents to detect and curtail excessive trading practices may also be limited by operational systems and technological limitations.

To the extent that the Company or its agents are unable to curtail excessive trading practices in a Fund, these practices may interfere with the efficient management of the Fund's portfolio, and may result in the Fund engaging in certain activities to a greater extent than it otherwise would, such as maintaining higher cash balances, using a line of credit and engaging in portfolio transactions. Increased portfolio transactions and the use of a line of credit would correspondingly increase a Fund's operating costs and decrease the Fund's investment performance, and maintenance of a higher level of cash balances would likewise result in lower Fund investment performance during periods of rising markets.

## **Structured Products**

Shareholders shall not structure or facilitate the structuring of, nor shall an investment in the Fund be associated with the structuring of, any financial product which is linked in any way to the investment in the Fund unless the Shareholder has given prior written notification to the Company, the Management Company, the Investment Manager or the Distributor. In the event that a Shareholder in the Fund fails to comply with the aforementioned requirement, then the Company reserves the right, at its sole discretion, to compulsorily repurchase and cancel any Shares held by the Shareholder and neither the Distributor, the Investment Manager, the Management Company nor the Company shall be liable whatsoever for any loss, liability or cost incurred or suffered by the Shareholder.

## **Issue and Redemption Prices / Calculation of Net Asset Value / Valuation of Assets**

During the Initial Offer Period of the relevant Fund, the issue price for Shares of such a Fund shall be, or was, the amount(s) set out in the relevant Supplement. The issue price at which Shares of any Fund will normally be issued on a Dealing Day, after the Initial Offer Period, is calculated by ascertaining the Net Asset Value of the relevant Fund as at the Valuation Point for that Fund for the relevant Dealing Day and may include an adjustment for swing pricing as fully described in the section entitled **Swing Pricing Procedure**.

The Net Asset Value of the relevant Fund is equal to the value of the assets of the relevant Fund as at the relevant Valuation Point less its liabilities (including specific charges, if any, applicable to a particular Class of Shares). The Net Asset Value per Share of the relevant Fund is calculated by dividing the Net Asset Value of the relevant Fund, by the total number of Shares in issue at the relevant Valuation Point. If a Fund has more than one Class of Shares, additional fees may be charged against certain Classes, and details of such fees will be set forth under the section entitled **Charges and Expenses** and

in the Supplement for the relevant Fund. This may result in the Net Asset Value per Share of each Class being different. The Valuation Point for a Fund is as of the close of business of the New York Stock Exchange on the relevant Dealing Day. Where each Fund has more than one Class of Shares, the Net Asset Value per Share of each Class will be calculated by dividing the net assets attributable to the relevant Class, by the total number of Shares in issue in the relevant Class at the relevant Valuation Point. The Net Asset Value per Share in each case is the resulting sum rounded to the nearest four decimal places, save for JPY Share Classes where it is the resulting sum rounded to the nearest currency unit. For Hedged Share Classes and the SC and TC Share Classes, the Net Asset Value also reflects the general costs and either gains or losses of the derivative transaction which will accrue solely to the relevant Share Class as individual derivative transactions are attributed specifically to the relevant Share Class.

The Articles provide for the method of valuation of the assets and liabilities of each Fund for the purpose of calculating the Net Asset Value of each Fund.

Securities which are listed or traded on a Market may be valued at last traded prices; where a security is listed on several exchanges, the relevant market shall be the one which constitutes the main market or the one which the Directors determine provides the fairest criteria in a value for the security. Securities listed or traded on a Market, but acquired at a premium or at a discount outside or off the relevant market may be valued taking into account the level of premium or discount at the date of valuation and the Depositary must ensure the adoption of such a procedure is justifiable in the context of establishing the probable realisation value of the security.

Securities which are listed or traded on a Market where the market price is unrepresentative or not available and unlisted securities shall be valued at the probable realisation value estimated with care and in good faith by the Directors; a competent person appointed by the Directors and approved for the purpose by the Depositary; or any other means provided the value is approved by the Depositary.

Fixed income securities may be valued using matrix pricing (i.e. valuing securities by reference to the valuation of other securities which are considered comparable in rating, yield, due date and other characteristics) where reliable market quotations are not available. The use of the matrix methodology will be determined by the Directors.

Units of collective investment schemes shall be valued at the latest available net asset value per unit as published by the collective investment scheme; the latest bid prices as published by the collective investment scheme; or if the scheme is listed on a Market, the latest market prices.

Cash (in hand or deposit) is valued at face/nominal value plus accrued interest.

Exchange traded futures and options contracts (including index futures) and other derivatives shall be valued based on the settlement price as determined by the market in question, provided that if a settlement price is not available, the value shall be the probable realisation value estimated with care and in good faith by the Directors or a competent person appointed by the Directors and approved for the purpose by the Depositary; or they will be valued by any other means provided the value is approved by the Depositary.

Over-the-counter derivative contracts will be valued on a daily basis. This may be done using the counterparty valuation provided that the valuation will be approved or verified by a party who is approved for the purpose by the Depositary and who is independent of the counterparty and the independent verification will be carried out at least weekly. An alternative valuation may be used provided that the Fund follows international best practice and adheres to the principles on valuation of

OTC instruments established by industry bodies; the alternative valuation is that provided by a competent person appointed by the Directors and approved for the purpose by the Depositary, or a valuation by any other means provided that the value is approved by the Depositary; and the alternative valuation will be reconciled to the counterparty valuation on a monthly basis. Where significant differences arise these will be promptly investigated and explained.

Forward foreign exchange and interest rate swap contracts will be valued according the same method set out for over the counter derivatives above or by reference to freely available market quotations.

Collateral received by the Company will be valued in accordance with these valuation procedures. Daily mark to market and daily variation margins are not expected to be used for these purposes.

A particular/specific asset may be valued using an alternative method of valuation if the Directors deem it necessary and the alternative method must be approved by the Depositary. For example fixed income securities may be valued using an evaluation methodology, that may include matrix pricing described above, where such method provides a more reliable price. Any such evaluation methodology will be based on the Company's Valuation Policy and Procedures.

The value of an asset may be adjusted by the Directors where such an adjustment is considered necessary to reflect the fair value in the context of currency, marketability, dealing costs and/or such other considerations which are deemed relevant.

The amortised cost method of valuation may only be used in relation to Funds which comply with the Central Bank's requirements for short-term money market funds and where a review of the amortised cost valuation vis-à-vis market valuation will be carried out in accordance with the Central Bank's guidelines.

Money market instruments in a money-market or a non-money-market Fund may be valued on an amortised basis in accordance with the Central Bank's requirements.

The Net Asset Value per Share of each Class will be available from the Administrator on request and in addition is published daily on [www.wellingtonfunds.com](http://www.wellingtonfunds.com) as well as Bloomberg's website, [www.bloomberg.com](http://www.bloomberg.com).

The Company may, in calculating the issue price, include in the issue price in respect of each Fund, for its own account, a charge sufficient to cover stamp duties and taxation (if any) in respect of the issue of Shares or certificates and delivery and insurance costs in respect of certificates.

The price at which Shares will be redeemed on a Dealing Day is calculated by ascertaining the Net Asset Value per Share or per Share in the relevant Class (as the case may be), in the manner outlined above. In addition, the Company may, in calculating the redemption price, deduct such sum as the Directors consider fair, in respect of redemption or exchange requests which will necessitate the Company breaking deposits at a penalty or realising investments at a discount, in order to realise assets to provide moneys to meet such redemption or exchange requests or, in the event that the Company borrows funds to meet any such redemption or exchange request, a sum to meet the cost of such borrowing.

### **Swing Pricing Procedure**

Funds may suffer dilution of the Net Asset Value per Share due to investors buying or selling Shares at a price that does not take into account dealing and other costs arising when the Investment Manager makes or sells investments to accommodate cash inflows or outflows. To counteract this, a partial swing

pricing mechanism may be adopted to protect Shareholders' interests. If on any Dealing Day, the aggregate net transactions in Shares for a Fund exceeds a pre-determined threshold, as determined by the Company from time to time, the Net Asset Value may be adjusted upwards or downwards to reflect net inflows and net outflows respectively as a means of apportioning trading costs associated with such transactions to the investors that create these costs in order to protect existing or remaining Shareholders. Where the Net Asset Value is adjusted upwards subscribing investors will pay and redeeming Shareholders will receive a higher Net Asset Value per Share than they would have done had the Net Asset Value not been adjusted. Where the Net Asset Value is adjusted downwards subscribing investors will pay and redeeming Shareholders will receive a lower Net Asset Value per Share than they would have done had the Net Asset Value not been adjusted. The extent of the swing factor price adjustment will be set by the Company to reflect bid-ask spreads, transaction taxes, dealing and other costs and may include an adjustment reflecting some portion, or the full value, of illiquid securities, which cannot be sold at the time of the redemption due to unforeseen events such as sanctions, capital controls or absence of trading activity. An example of such an unforeseen event was the impact on Russian securities following the hostilities in Ukraine. The swing factor adjustment for the illiquid securities will be accounted for as a valuation reserve until such time as the securities become liquid, are sold, or are written off and is not expected to exceed 2% of the original Net Asset Value per Share. As a result, redeeming shareholders may not realize any value on these illiquid securities if they ultimately become liquid and have value. Partial swing pricing may be applied by the Company to any Fund of the Company and is not aimed at addressing the specific circumstances of each individual investor transaction. The total swing factor price adjustment is not expected to exceed 3% of the original Net Asset Value per Share under normal market circumstances. The swing factor and swing thresholds are set and reviewed on a quarterly basis by a Wellington Management group swing pricing review governance group, which reports to the board of the Company on a quarterly basis. This group has the ability to respond to market events (e.g. higher market volatility) and make intra quarter adjustments. In any other cases where there are net subscriptions or redemptions in a Fund and the Directors reasonably believe that imposing a partial swing price is in the best interests of existing Shareholders, the Company may, at its discretion, impose one.

### **Suspension of Calculation of Net Asset Value**

The Company may at any time temporarily suspend the calculation of the Net Asset Value of any Fund and the right of Shareholders to require the redemption or exchange of Shares of any Class (i) during any period when any of the principal markets or stock exchanges on which a substantial part of the investments of the relevant Fund are quoted is closed, otherwise than for ordinary holidays, or days during which dealings therein are restricted or suspended; (ii) during any period when, as a result of political, economic, military or monetary events or any circumstances outside the control, responsibility and power of the Directors, disposal or valuation of investments of the relevant Fund is not reasonably practicable without this being seriously detrimental to the interests of Shareholders of the relevant Class or if, in the opinion of the Directors, redemption prices cannot fairly be calculated; (iii) on or following a decision being made by the Directors to terminate a Fund; (iv) during any breakdown in the means of communication normally employed in determining the price of any of the Company's investments and other assets or when for any other reason the current prices on any market or stock exchange of any assets of the relevant Fund cannot be promptly and accurately ascertained; or (v) during any period during which the Company is unable to repatriate funds required for the purpose of making payments due on redemption of Shares of any Class or during which the transfer of funds involved in the acquisition or realisation of investments or payments due on redemption of Shares cannot, in the opinion of the Directors, be effected at normal prices or normal rates of exchange. The Central Bank may also require the suspension of redemption of Shares of any Class in the interests of the Shareholders or the public. The Company will, whenever possible, take all reasonable steps to bring any period of suspension to an end as soon as possible.

Shareholders who have requested issue or redemptions of Shares of any Class or exchanges of Shares of one Class to another will be notified of any such suspension in such manner as may be directed by the Directors and their requests will be dealt with on the first Dealing Day after the suspension is lifted. The Central Bank shall be notified immediately and in any event within the same business day, of any such suspension.

Any trading losses incurred due to the suspension will be borne out of the assets of the Fund. In particular, but without limitation, the Investment Manager may have begun trading on a subscription, conversion or redemption order in advance of the suspension; this may involve the trades being reversed at a loss to the Fund which will be borne by the existing Shareholders of the Fund.

### **Restriction on Ownership and Transfer of Shares**

The Articles of Association of the Company give powers to the Directors to impose restrictions on the holding of Shares by (and consequently to redeem Shares held by), or the transfer of Shares to, United States Persons or by any person who appears to be in breach of the laws or requirements of any country or government authority or by any person or persons in circumstances (whether directly or indirectly affecting such person or persons, and whether taken alone or in conjunction with any other persons, connected or not, or any other circumstances appearing to the Directors to be relevant) which, in the opinion of the Directors, might result in the Company incurring any liability to taxation or suffering any other pecuniary or regulatory disadvantages which the Company might not otherwise have incurred or suffered. In the absence of express approval by the Directors, Shares may not be beneficially held by any Restricted Person or Covered Person. The Articles of Association also permit the Directors where necessary to repurchase and cancel Shares held by a person who is or is deemed to be or is acting on behalf of a Taxable Irish Person on the occurrence of a chargeable event for taxation purposes.

### **Termination of Funds**

Any Fund may be terminated by the Directors, in their sole and absolute discretion, by notice in writing to the Depositary in any of the following events:-

- i. if at any time the Net Asset Value of the relevant Fund has decreased to, or has not reached, the minimum level determined by the Directors for that Fund in order for it to be managed or administered in an efficient manner;
- ii. changes in the legal, political, economic, military, regulatory or business environments would justify, in the opinion of the Directors, such termination;
- iii. if any Fund shall cease to be approved by the Central Bank; or
- iv. if the Directors consider, for any reason, that it is in the best interests of the Shareholders of the relevant Fund including in, but not limited to, the following circumstances;
  - a. where a product rationalisation would, in the opinion of the Directors, justify such termination;
  - b. significant redemption or switching requests submitted by one or more Shareholders of a Fund where the processing of such requests would affect the Fund's ability to conduct its investment policy or to otherwise operate efficiently

Where the Directors decide to terminate a Fund, the Directors will notify the Shareholders in the relevant Fund of the decision and inform Shareholders of the effective date of the termination, such

date to be the date of the decision or a subsequent date determined by the Directors at their discretion. No shares in the relevant Fund may be issued and Shareholders will no longer be entitled to request redemption or exchange of their shareholding from the effective date of the termination. As the effective date of the termination may be a date subsequent to the date of the Directors' decision to terminate, the Directors when notifying Shareholders of the decision to terminate will indicate whether redemption or exchange requests may be made by Shareholders prior to the effective date. This would only be likely to be permitted by the Directors where Shareholders can be treated equally. On the instruction of the Directors, the Investment Manager will realise all the assets of the Fund and the Depositary will distribute all net cash proceeds from the realisation of the assets to the Shareholders in proportion to their respective shareholding.

## CHARGES AND EXPENSES

### Investment Management Fees

The Investment Manager shall be paid an investment management fee out of the assets of each of the Funds. The investment management fee is calculated as a percentage of the daily net assets attributable to each Class of Shares, accrued daily in the Net Asset Value of the relevant Class of Shares and paid monthly in arrears at the annual rate set out in the relevant Supplement. In addition to the investment management fee, a performance fee may also be payable to the Investment Manager in respect of certain Funds as described in further detail in the Performance Fees section below and in the relevant Supplement.

Where permitted by applicable regulation, the Investment Manager may in its own discretion, rebate out of its own assets all or a portion of its fees to financial intermediaries who purchase or solicit sales of Shares of the Funds for their underlying clients. Investors should ask their financial intermediaries about any such payments they may receive, and any associated conflicts of interest they may have in recommending a Fund. Financial intermediaries may impose additional costs and fees in connection with their own programmes or services. In addition, the Investment Manager may enter into an arrangement with any single investor whereby it rebates out of its own assets all or a portion of its fees. Such arrangements will result in some investors paying lower investment management or performance fees than other investors.

### Performance Fees

In addition to the base investment management fee, the Investment Manager may also be paid a performance fee, based on the Share Class' net return or Net Asset Value per Share (excluding any swing pricing adjustment) but inclusive of any performance fee previously accrued in respect of such Performance Period.

The performance fee is accrued daily in the Net Asset Value of each relevant Class and is calculated as described below in respect of the relevant performance fee mechanism.

The period at the end of which the accrued performance fee is crystallised and paid (the "**Performance Period**") is generally the Company's fiscal year (1 January – 31 December), but may also a) begin mid-year in certain circumstances from the launch of a Fund or Share Class and; b) end mid-year from the previous Performance Period's end, to the closure of a Fund or Share Class. For Funds using the High Water Mark, Performance Benchmark with High Water Mark and Hurdle mechanisms in cases of a launch of a Fund or a Share Class in the ongoing Performance Period the performance fee will crystallise at the end of the current Performance Period. When this occurs, the Performance Period may be less than one calendar year. For Funds using the Performance Benchmark mechanism in cases of a launch of a Fund or a Share Class in the ongoing Performance Period the performance fee will crystallise at the

end of the immediately following Performance Period. When this occurs, the Performance Period may be longer than one calendar year.

Subject to the exceptions above, the performance fee is crystallised at the end of each Performance Period and is paid annually in arrears as soon as practicable after the end of the relevant Performance Period. The end of the Performance Period is generally the Company's fiscal year end, except where a Fund or Share Class closes mid-year as described above. As well as crystallising at the end of each Performance Period, a proportion of accrued performance fees is crystallised on any Dealing Day (other than the last Dealing Day of the Performance Period) in which there is a net reduction in the number of Shares in a Share Class but only in respect of such net reduction. Any accrued performance fee with respect to such net reduction of Shares will crystallise on that Dealing Day and will be paid as soon as is practicable to the Investment Manager.

### **Performance Fee Types**

For certain Share Classes a High Water Mark, Performance Benchmark, Hurdle or Performance Benchmark with a High Water Mark may also be applicable. Worked examples of performance fee calculations are included in Appendix V.

#### ***a) High Water Mark (HWM)***

Where a HWM mechanism applies, a performance fee will be accrued on the basis of the increase in a Share Class' Net Asset Value per Share in excess of the HWM, over a Performance Period, multiplied by the average number of Shares in issue for the Performance Period calculated for each Dealing Day. The average number of Shares used for the performance fee calculation is calculated on each Dealing Day and adjusted on any Dealing Day in which there is a net reduction of Shares in a Share class. At the launch of a Share Class, the HWM means the Initial Issue Price and is taken as the starting point for the performance fee calculation. If the Net Asset Value per Share on the last Dealing Day of a Performance Period is higher than the previous HWM, the HWM is set to the Net Asset Value per Share calculated at the end of the Performance Period. To the extent that the Share Class' Net Asset Value per Share did not exceed its HWM at the end of a Performance Period, the HWM is carried forward, and no performance fees will be accrued until the Net Asset Value per Share of that Share Class exceeds its HWM in a subsequent Performance Period. When this occurs, the Performance Period will extend beyond one year and continue until the end of the next Performance Period when a performance fee does crystallise. The HWM will be adjusted for any distributions in the case of a Distributing Share Class.

#### ***b) Performance Benchmark***

Where a Performance Benchmark applies, a performance fee may be accrued on the basis of a Share Class' net return per Share in excess of the return of the Performance Benchmark over a Performance Period, multiplied by the average number of Shares in issue for the Performance Period calculated on each Dealing Day. The average number of Shares used for the performance fee calculation is calculated on each Dealing Day and adjusted on any Dealing Day in which there is a net reduction of Shares in a Share Class. The Performance Benchmark is expressed in the denomination currency of the relevant Share Class, or for Hedged Share Classes, hedged to the denomination currency of the relevant Class. If the net return per Share on the last Dealing Day of a Performance Period is higher than the Performance Benchmark over the same period, the performance fee will crystallise. The net return per Share may exceed the Performance Benchmark and crystallise a performance fee even where the Share Class' Net Asset Value per Share decreases. To the extent that a Share Class' net return per Share did not exceed its Performance Benchmark at the end of a Performance Period, no performance fee will accrue until the Share Class' net return per Share's cumulative net return exceeds the cumulative Performance Benchmark return over the

same period. When this occurs, the Performance Period will extend beyond one year and continue until the end of the next Performance Period when a performance fee does crystallise. The Performance Benchmark will be adjusted for any distributions in the case of a Distributing Share Class.

**c) Hurdle**

Where a Hurdle mechanism applies, a performance fee may be accrued on the basis of a Share Class' Net Asset Value per Share in excess of the Hurdle over a Performance Period multiplied by the average number of Shares in issue for the fiscal year calculated on each Dealing Day. The average number of Shares used for the performance fee calculation is calculated on each Dealing Day and adjusted on any Dealing Day in which there is a net reduction of Shares in a Share Class. The Hurdle is the Initial Issue Price of a Share plus a predefined rate, set on a Fund by Fund basis. The Hurdle is calculated as a percentage of the Initial Issue Price, annualised to create a daily rate which is accrued daily for that Performance Period. In the event that the Net Asset Value per Share of a Share Class is higher than the accrued Hurdle on the last Dealing Day of that Performance Period, the performance fee will crystallise, and the Hurdle for the following year will be the previous Performance Period end Net Asset Value per Share of that Share Class plus the predefined rate annualised, and accrued daily. To the extent that a Share Class' Net Asset Value per Share does not exceed the Hurdle on the last Dealing Day of the Performance Period, no performance fee will crystallise, and the new Hurdle for the following year will be the Hurdle from the last Dealing Day of the previous Performance Period, plus a rate equal to the predefined rate, annualised and accrued daily. When this occurs, the Performance Period will extend beyond one year and continue until the end of the next Performance Period when a performance fee does crystallise.

Note that for any non-Base Currency Classes which are unhedged, the performance fee accrual will be calculated based on the Class' Net Asset Value in excess of the Hurdle which may be positively or negatively impacted by currency differentials between the Fund's Base Currency and the currency of the unhedged Class. As a result the performance fee for these Classes may differ significantly from the performance fees for Hedged/Base Currency Classes. The Hurdle for Distributing Share Classes will be reduced for any distributions made with respect to such Share Classes.

**d) Performance Benchmark with HWM**

Where a Performance Benchmark with a HWM applies, a performance fee will be accrued on the basis of a Share Class' net return per Share in excess of the Performance Benchmark and the HWM, over a Performance Period, multiplied by the average number of Shares in issue for the fiscal year calculated on each Dealing Day. The average number of Shares used for the performance fee calculation is calculated on each Dealing Day and adjusted on any Dealing Day in which there is a net reduction of Shares in a Share Class. The Performance Benchmark is expressed in the denomination currency of the relevant Share Class, or for Hedged Share Classes, hedged to the denomination currency of the relevant Class. At the launch of a Share Class, the HWM means the Initial Issue Price and is taken as the starting point for the performance fee calculation. If (i) the net return per Share on the last Dealing Day of a Performance Period is higher than the Performance Benchmark over the same period and (ii) the Net Asset Value per Share is higher than the previous HWM, then the performance fee will crystallise. If the Net Asset Value per Share on the last Dealing Day of a Performance Period is higher than the previous HWM, the HWM is set to the Net Asset Value calculated at the end of the Performance Period. To the extent that a Share Class' net return per Share did not exceed its Performance Benchmark and the Net Asset Value per Share did not exceed the HWM at the end of a Performance Period, no performance fee will accrue until the Share Class' cumulative net return exceeds the cumulative Performance Benchmark return and the



Net Asset Value per Share exceeds the HWM over the same period. When this occurs, the Performance Period will extend beyond one year and continue until the next Performance Period when a performance fee does crystallise. The HWM and Performance Benchmark will be adjusted for any distributions in the case of a Distributing Share Class.

The mechanisms employed in respect of performance fees are detailed for each relevant Fund in the relevant Supplement.

### ***Further Considerations***

Due to differences in timing between their date(s) of investment and a Class' performance fee calculation period, subscribers and Shareholders of the Fund should be aware that their own individual performance experience as a Shareholder may not be equivalent to the actual performance of the Fund on which the performance fee is calculated and paid, and the performance fee paid by the Fund may be higher or lower than the actual performance they experience as a Shareholder. Although a daily accrual of a portion of the performance fee in a Class' Net Asset Value mitigates some of these timing differences, the performance fee is calculated and paid based on the Class' fiscal year assets and performance, not on the basis of a Shareholder's specific assets or performance.

The Class' net return on which the performance fee is based, includes net unrealised gains and losses as at the end of each calculation period and as a result, a performance fee may be paid on unrealised gains which may subsequently never be realised. The performance fee is calculated prior to any dilution adjustments and is verified by the Depositary on a periodic basis and is therefore not open to the possibility of manipulation. Performance fees are paid where the relevant HWM is surpassed, which may be achieved due to market movements.

### **Distribution Fees**

Shareholders in the Class D, Class DL and other Share Classes as specified in the relevant Supplement will be paid a distribution fee, out of the assets of the relevant Fund attributable to those Classes of Shares. The distribution fee is calculated as a percentage of the daily net assets attributable to those Shares held by the relevant Shareholder, accrued daily in the Net Asset Value of the relevant Class of Shares and paid quarterly in arrears at the annual rates set out in the relevant Supplement.

The distribution fee is paid to intermediaries holding these Classes of Shares to compensate them for distribution and Shareholder services provided to underlying beneficial owners of these Shares. Investors considering investing via an intermediary should be aware of these fees and the potential for conflict of interest that they create where, for example, an intermediary might be incentivised to recommend a particular Fund, or Class of Shares within a Fund, that has a higher distribution fee.

### **Administrative Fee**

The Management Company shall be paid an administrative fee out of the assets of each Fund, attributable to the relevant Class of Shares. This administrative fee is calculated as a percentage of the daily net assets of the relevant Class of Shares, accrued daily in the Net Asset Value of the Class of Shares and paid quarterly in arrears. The administrative fee rate that is paid in respect of a Share Class is set out in the relevant Fund's Supplement.

The administrative fee is paid for the provision of various services to the Funds. The purpose of the administrative fee is to provide a fixed level of fees to cover the expenses of the Funds for the various services provided, which expenses might otherwise be subject to fluctuation over time. The administrative fee ensures that the Funds are protected from these fluctuations, which would not be

the case if the Funds were to pay such charges directly. Any increase in the maximum rate of the administrative fee set out in the relevant Fund's Supplement will only be implemented upon receipt of the affected Shareholders' approval.

The administrative fees are fixed which means that the Management Company or other Wellington group entity elected by the Management Company will bear any costs and expenses incurred by the relevant Class of Shares in any period in excess of the administrative fee charged to the Class of Shares but conversely will be entitled to retain any amount of the administrative fee paid to it which exceeds the actual operating expenses incurred by the relevant Class of Shares during any period. The Management Company in its discretion may choose to waive a portion of the administrative fee as the level of assets in a particular Fund increases; however, as the level of assets in a particular Fund decreases, the Management Company may withdraw any waiver of the administrative fee. The maximum administrative fee per Share Class is disclosed in the relevant Supplement.

Further the Management Company may instruct the Company to pay a portion of the administrative fee directly out of the assets of the Funds to any third party service providers. In such case the administrative fee due to the Management Company will be reduced by the same amount.

The administrative fee covers the following expenses, if applicable to the relevant Class of Shares:

- Depository fees and reasonable, properly incurred out of pocket expenses
- Administrator fees and reasonable out of pocket expenses
- Transfer Agent fees and reasonable out of pocket expenses
- fees relating to services provided to the Company by affiliates within the Wellington Management group, including, but not limited to, providing, procuring, overseeing, and/or monitoring of various services including administrative, domiciliary, corporate, risk management, regulatory compliance, reporting services and fees incurred by these entities and payable to third parties providing certain infrastructure and other support services
- fees in consideration of the services provided by the Distributor (and its affiliates) in establishing, servicing on an ongoing basis and administering relationships with financial intermediaries and distributors and the cost incurred, including the costs of performing diligence on financial intermediaries/distributors, the additional oversight of third parties service providers, and the provision of additional marketing support
- fees of the Directors of the Company and the Management Company who are not employed by affiliates of the Wellington Management group, as well as reasonable out of pocket expenses incurred in discharging their directors' duties
- Auditor's and company secretarial fees and reasonable out of pocket expenses
- professional costs (including, without limitation, the fees and disbursements of counsel, consultants, tax and other advisers or third party support services) that may be incurred by the Company, the Management Company, the Depositary, the correspondents or the Administrator or affiliates of the Wellington Management group while acting in the interest of the Shareholders
- the costs of taking out and maintaining any insurance policy in relation to the Company and/or its Directors
- any start-up costs associated with the creation of a new Fund or Class and the offer of its Shares;
- the costs associated with preparing and/or filing, translating, distributing, or maintaining any materials or documents of the Company, including, without limitation, the Prospectus (as well as any amendments or supplements), Key Investor Documents, Fact sheets, websites, annual and semi-annual reports or other documents as may be required under the Articles or under the applicable laws or regulations as well as registration or private placement costs incurred for purposes of distributing Shares of the Company (including any lawyers', auditors' and

other experts' fee in connection with the foregoing, as well as any administrative charges or taxes incurred) and the costs associated with ratings and/or ranking of Funds

- unless otherwise stated in the relevant Supplement, fees payable to third parties for currency management services in relation to the Hedged Share Classes or SC and TC Share Class

The following are not covered by the administrative fee, are not subject to any maximum limit or cap and will be paid by the Company out of the assets of each Fund:

- investment management fees
- performance fees
- distribution fees
- all taxes (including without limitation, all income and franchise taxes), levies, duties or similar charge which may be due on or with respect to the assets and income of the Company
- all costs of purchasing or selling assets of the Company including but not limited to brokerage charges, subscription and redemption charges, implicit transactions costs, costs associated with execution/trading or settlement platforms, costs associated with derivative use and any losses incurred in connection therewith are for the account of the relevant Fund
- costs of borrowing including interest
- any extraordinary expenses, such as litigation (for instance, fees connected with the filing of class action lawsuits) legal, business or tax expert appraisals or legal proceedings undertaken to protect Shareholders' interests and all similar charges and expenses

Such fees, duties and charges will be charged to a Fund or Share Class in respect of which they were incurred or, where an expense is not considered by the Directors to be attributable to any one Fund, the expense will be allocated by the Directors with the approval of the Depositary, in such manner and on such basis as the Directors in their discretion deem fair and equitable.

### **Preliminary, Redemption and Exchange Charges**

No preliminary, redemption or exchange charge will be made on subscriptions for Shares or requests for redemption of Shares or exchange of Shares in a Fund by the Company, the Management Company, the Distributor or the Investment Manager. The Directors reserve the right to add such fees in the future.

Shareholders may be charged a transaction fee by their financial advisor or the intermediary. Where investors are subscribing in BN, D, DL, ED or GD Share Classes through a financial intermediary, a preliminary charge of up to 5% for BN, D, ED and GD Shares or 3% for DL Shares of the amount of the investment in the relevant Fund may be payable to the financial adviser or intermediary. Investors should consult their financial adviser or the intermediary about any such fees.

### **Soft Commissions**

In the selection of broker-dealers and other counterparties and in the execution of transactions in portfolio securities for a Fund, the Investment Manager seeks to achieve the most favourable price and best execution available under the circumstances. In assessing the terms of a particular transaction, consideration may be given to various relevant factors, including the market for the security and difficulty of executing the transaction, the price of the security, the financial condition and execution expertise of the intermediary, the reasonableness of the commission, if any, and the brokerage or research services provided by the intermediary to the Investment Manager. Subject always to the requirement of most favourable price, best execution and applicable laws, the Investment Manager may pay a higher commission than might be otherwise available in consideration of such brokerage and research services which assist the Investment Manager in providing investment services to the

Company, provided that the Investment Manager determines in good faith that such commission is reasonable in relation to the value of brokerage and research services. Such brokerage and research services may apply to the Investment Manager's services to a Fund or to its other clients. Disclosure of the fact that soft commissions have been paid in respect of a Fund will be set forth in the Company's semi-annual and annual accounts.

## **MANAGEMENT AND ADMINISTRATION**

### **The Board of Directors**

The Board of Directors is responsible for managing the business affairs of the Company in accordance with the Articles of Association. The Directors may delegate certain functions to the Management Company, the Administrator, the Transfer Agent, the Investment Manager and other parties, subject to supervision and direction by the Directors.

The Directors of the Company are described below. The following Directors may also be directors, partners or employees of the Management Company, Investment Manager, the Distributor or other Wellington Management group companies.

#### *Lucinda Marrs*

Ms. Marrs is a Senior Managing Director and Partner, Head of Global Wealth and Co-Head of Alternatives. Prior to joining Wellington Management in 1994, Ms. Marrs worked as an investment consultant at Evaluation Associates (1989-1994) and held investment-related positions at Paine Webber, Inc. (1986-1987) and Olin Corporation (1983-1985). Ms. Marrs received her MBA from Columbia Business School (1989) and her BS in chemistry, cum laude, from Duke University (1983).

#### *Sergio Betancourt*

Mr. Betancourt is Head of the Wellington Management Funds Global Group. Prior to this Mr. Betancourt was a Director, EMEA Fund Product responsible for leading the team that oversees all aspects of the fund lifecycle, including approval, design, launch, fiduciary and marketing oversight, and closure. Prior to joining Wellington Management in 2004, Mr. Betancourt worked as a banker in the mergers and acquisitions and equity capital markets divisions of Deutsche Bank in London. Mr. Betancourt earned his MBA in finance from the University of Pennsylvania (Wharton, 1999), and his BA in economics and political science from the University of Vermont (1993). Additionally, he holds the Chartered Financial Analyst designation and is a member of the CFA Institute.

#### *Susanne Ballauff*

Ms. Ballauff is the President of the Wellington Management Funds Global Group (WMF Global). Prior to joining Wellington Management in 2005, Ms. Ballauff held sales position at JPMorgan in Frankfurt and London (2001-2005) and at Commerzbank (1995-2000). Ms. Ballauff studied business administration and economics at Philipps-Universität Marburg and Justus-Liebig-Universität in Gießen and graduated as Diplom-Kauffrau in 1994. Additionally, she holds the Deutsche Vereinigung für Finanzanalyse und Anlageberatung (DVFA)/Chartered European Financial Analyst designation (CEFA).

The following directors are not affiliated with the Investment Manager.

#### *Gerald Brady*

Mr. Brady is an independent, non-executive director and consultant in the regulated, international financial services industry. Mr. Brady has over 30 years' experience of the funds industry, both as a director and full-time executive, and has held senior executive management positions in Bank of Bermuda, Capita Financial Group and Northern Trust. Mr. Brady has worked both abroad and in Ireland and is a past Council member of the Irish Funds Industry Association (IFIA) and former Executive Board member of Financial Services Ireland/Irish Business and Employers Confederation (FSI/IBEC). Mr. Brady has a First Class Honours degree in Economics and is a Fellow of the Institute of Chartered Accountants of Ireland (FCA) and a Chartered Financial Analyst (CFA).

### ***Marion Mulvey***

Ms. Mulvey is an Irish resident Independent non-executive director in the funds industry. Ms. Mulvey has over thirty years of experience in the financial services sector, including as a director and full-time executive. Ms. Mulvey held senior executive management positions in J.P. Morgan Asset Management in London acting as Head of Operations and Co-CAO for EMEA (2013-2023) as well as Citi in Dublin as Head of Alternative Investment Services EMEA (2009-2013) and Head of Fund Accounting (2000-2009). Ms. Mulvey is a Chartered Director, member of the Institute of Directors Ireland and a Chartered Accountant and Fellow of the Institute of Chartered Accountants Ireland.

### **The Management Company**

Effective from 1 July 2021, the Company has appointed Wellington Luxembourg S.à.r.l. as Management Company to be responsible on a day-to-day basis under the supervision of the Directors, for providing administration, investment management and advice services in respect of all Funds. The Management Company may delegate part or all of the marketing relating to a Fund to the Distributor, Administrator or Transfer Agent. The Management Company may delegate part or all of the investment management services relating to a Fund to an Investment Manager, as specified in the relevant Supplement.

The Management Company was incorporated on 30 August 1991 under the form of a *société en commandite par actions* (S.C.A.), which was then converted to a *société anonyme* (S.A.) on 31 October 2006, and subsequently converted into a *société à responsabilité limitée* (S.à r.l.) on 5 December 2014, under the laws of the Grand Duchy of Luxembourg and its articles of incorporation are deposited with the *Luxembourg Registre de Commerce et des Sociétés*. The Management Company is approved as a management company regulated by chapter 15 of the Luxembourg Law of 17 December 2010 (the **2010 Law**) as well as an alternative investment fund manager (the **AIFM**) regulated by the Luxembourg Law of 13 February 2007 (the **2007 Law**). The ultimate parent company of the Management Company is Wellington Management Group LLP. As at the date hereof, the share capital of the Management Company is USD 3,219,145.89, and the Management Company will comply at all times with article 102 of the 2010 Law. The Management Company may also be appointed to act as management company for other investment funds, the list of which will be available, upon request, at the registered office of the Management Company.

The board of managers of the Management Company has appointed conducting officers responsible for the day-to-day management of the Management Company in accordance with article 102 of the 2010 Law. The company secretary function is carried out internally.

The Management Company will ensure compliance of the Funds with the relevant investment restrictions and oversee the implementation of each Fund's objective and investment policy. The Management Company will receive periodic reports from the Investment Manager detailing the Funds' performance and analysing their investment. The Management Company will receive similar reports

from the other services providers in relation to the services which they provide. The Management Company shall report to the Company on a quarterly basis and inform the Directors of any non-compliance of the Company with the investment restrictions.

The managers of the Management Company are described below.

*Thomas Nummer*

Mr. Nummer is an independent non-executive director for a number of funds and investment management companies domiciled in Luxembourg and Cayman. He has over 25 years of experience in the financial industry. He is a seasoned risk manager with specialist knowledge of investment compliance and risk management within UCITS and alternatives funds governed by the AIFMD framework. Mr. Nummer was previously Managing Director of Carne Global Financial Services in Luxembourg and also worked for Allianz Global Investors Luxembourg S.A., and ADIG Investment in Luxembourg. He has a degree in Finance and Economics from the University of Trier, Germany, and a post-graduate qualification (financial analyst – CEFA) from the Society of Investment Professionals in Germany (DVFA).

*Carine Feipel*

Carine Feipel is an independent attorney and non-executive director of several companies in the financial services sector, including a bank, several insurance companies and investment funds. She is further the Chair of the Luxembourg Institute of Directors ('ILA'). She is a Certified Director by INSEAD and ILA. Ms. Feipel was previously a partner at Arendt & Medernach, a leading independent business law firm. She has a degree in Law from the Free University of Brussels, Belgium and is admitted to the Luxembourg bar.

*Lucinda Marrs*

Please see **The Board of Directors** section above.

*Alain Vincent Mandy*

Mr. Mandy is the Chief Transformation Officer of Wellington Management Funds Global Group. Prior to joining Wellington Management in 2018, Mr. Mandy was the Head of Fund Administration at PIMCO (2008-2018), and held various positions with a focus on asset management at PricewaterhouseCoopers in the United States, Luxembourg and Spain (1998–2008). Mr. Mandy received a master of science in business engineering (1998) from Louvain School of Management, University Catholic of Louvain and a Diploma in Analysis, Control and Auditing from HEC, Belgium. He is a chartered accountant from Luxembourg.

*Thomas Murray*

Mr Murray is a Managing Director at Wellington and Director of Fund Initiatives within the Fund Services group. Prior to joining the firm in 2004, Mr Murray worked at MFS Investment Management, where he held several different roles including controller, chief administration officer, and chief financial officer for various divisions (1992 – 2004). He also worked as an auditor for KPMG Peat Marwick (1990 – 1992). Mr Murray earned his MBA in Finance from Boston University (1998), and a BS in Accounting from Providence College (1990). Additionally Mr Murray earned the CPA designation in the State of Rhode Island.

## The Investment Manager

The Investment Manager for each Fund is Wellington Management Company LLP, a limited liability partnership organised in 2014 under the laws of the State of Delaware, U.S.A, which is registered as an investment adviser with the Securities and Exchange Commission under the Investment Advisers Act of 1940, as amended. Pursuant to an investment management agreement (summarised under the section entitled **General Information** below) the Investment Manager also provides or arranges for shareholder liaison matters, performs liaison functions with the Depositary, the Administrator and the Transfer Agent, and may act in such other capacities as the Management Company may approve. All or a portion of the investment management services for a Fund may be carried out by personnel who are employed by affiliates of the Investment Manager. Furthermore, the Investment Manager may choose to delegate the discretionary investment management of a Fund or a portion of a Fund to an affiliate by way of a sub-investment management arrangement. In such instance, the affiliate will be paid out of the fee payable to the Investment Manager in respect of the relevant Fund and information in respect of the relevant affiliates will be provided to the Shareholders on request and will be disclosed in the periodic reports of the Company. In all cases the relevant Investment Manager remains responsible for all investment management services under its agreement with the Management Company.

A list showing, for each Fund the identity of the Investment Manager, and/or sub-investment managers responsible for managing the relevant Fund is available on [www.wellington.com](http://www.wellington.com).

The Wellington Management group provides discretionary portfolio management services and financial advisory services related to portfolio management to a range of institutional clients and CISs. As of 2023, the amount of assets under discretionary management by the Wellington Management group was approximately USD 1.3 trillion.

## Depositary

The Company has appointed State Street Custodial Services (Ireland) Limited (the “Depositary”) to act as depositary in relation to the assets of the Company pursuant to a Depositary Agreement (summarised under the section entitled **General Information** below).

The principal activity of the Depositary is to act as depositary in relation to the assets of CIS. The Depositary is regulated by the Central Bank.

The Depositary is a private limited company incorporated in Ireland on 22 May 1991. The Depositary is an indirect, wholly-owned subsidiary of State Street Corporation.

The Depositary shall carry out functions in respect of the Company including but not limited to the following:

- (i) the Depositary shall hold in custody all financial instruments capable of being registered or held in a financial instruments account opened in the Depositary's books and all financial instruments capable of being physically delivered to the Depositary;
- (ii) the Depositary shall verify each Fund's ownership of all any assets (other than those referred to in (i) above) and maintain and keep up-to-date a record of such assets it is satisfied are owned by the Funds;
- (iii) the Depositary shall ensure effective and proper monitoring of each Fund's cash flows;
- (iv) the Depositary shall be responsible for certain oversight obligations in respect of the Company – see **Summary of Oversight Obligations** below.

Duties and functions in relation to (iii) and (iv) above may not be delegated by the Depositary.

#### *Summary of Oversight Obligations*

The Depositary is obliged to ensure, among other things, that:

- the sale, issue, redemption and cancellation of Shares effected on behalf of the Company are carried out in accordance with the conditions imposed by the Central Bank and the Memorandum and Articles of Association of the Company;
- the value of Shares is calculated in accordance with the Regulations and the Memorandum and Articles of Association of the Company;
- in transactions involving the assets of the Funds, any consideration is remitted to it within time limits which are acceptable market practice in the context of a particular transaction;
- the Company and each Fund's income is applied in accordance with the Regulations and the Memorandum and Articles of Association of the Company;
- the instructions of the Company are carried out unless they conflict with the Regulations or the Memorandum and Articles of Association of the Company;
- effective and proper monitoring of the Company's and each Fund's cash flows; and
- safe-keeping of the Company's assets, including the safekeeping of financial instruments to be held in custody and ownership verification and record keeping in relation to other assets.

In addition, the Depositary will be obliged to enquire into the conduct of the Company in each financial year and to report thereon to the Shareholders. The Depositary's report shall be delivered to the Company in good time to enable it to be included in the annual report of the Company. The Depositary's report shall state whether in the Depositary's opinion the Company has been managed in that period:

- (i) in accordance with the limitations imposed on the investment and borrowing powers of the Company by the Memorandum and Articles of Association of the Company and by the Regulations; and
- (ii) otherwise in accordance with the provisions of the Memorandum and Articles of Association of the Company and the Regulations.

If the Company has not complied with (i) or (ii) above, the Depositary must state why this is the case and outline the steps which the Depositary has taken to rectify the situation.

#### *Delegation*

The Depositary has full power to delegate the whole or any part of its safe-keeping functions but its liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping. The Depositary's liability shall not be affected by any delegation of its safe-keeping functions under the Depositary Agreement.

Information about the safe-keeping functions which have been delegated and the identification of the relevant delegates and sub-delegates are contained in Appendix IV to this Prospectus.

#### **Administrator**

The Administrator has been appointed by the Management Company to act as administrator for the Company (the "Administrator").



The Administrator is responsible for performing the day to day administration of the Company and for providing fund accounting for the Company, including the calculation of the Net Asset Value and the Net Asset Value per Share.

The Administrator is a private limited company incorporated in Ireland on 23 March 1992.

In addition, an affiliate of the Depositary and Administrator, State Street Bank International GmbH (“SSBG”) has been appointed to manage currency hedging for certain of the Funds’ Hedged Share Classes and SC and TC Share Classes. SSBG is a limited company incorporated in Germany. The company was founded in 1970 and is based in Munich, Germany. State Street Bank International GmbH operates as a subsidiary of State Street Holdings Germany GmbH.

Each of the Depositary, the Administrator and SSBG ultimately are owned by State Street Corporation. State Street Corporation is a leading world-wide specialist in providing global investors with investment servicing and investment management. State Street Corporation is headquartered in Boston, Massachusetts, U.S.A.

### **Transfer Agent**

The Management Company has appointed State Street Fund Services (Ireland) Limited (the “Transfer Agent”) to act as registrar and transfer agent under a Registrar and Transfer Agency Agreement. The Transfer Agent is a private limited company incorporated in Ireland.

The Transfer Agent is responsible for providing registration, transfer agency and related services to the Company but may delegate such services to an affiliate.

The Transfer Agent was incorporated in Ireland on 23 March 1992 and is ultimately a wholly owned subsidiary of State Street Corporation.

### **Distributor**

The Management Company has appointed Wellington Global Administrator, Ltd (the “Distributor”) to act as distributor under a Distribution Agreement.

The Distributor receives a distribution co-ordination fee out of the administrative fee as described under **Charges and Expenses** above.

The Distributor will coordinate, provide for and supervise the distribution of Shares indirectly through various sub-distributors or other financial intermediaries pursuant to terms and conditions set out in an appropriate agreement with such intermediaries.

The Distributor is an exempted company organised under the laws of Bermuda and is within the Wellington Management group.

### **TAXATION**

**The following sections do not purport to deal with all of the tax consequences applicable to the Company or to all categories of Shareholders, some of whom may be subject to special rules, and do not constitute tax advice. Shareholders and potential investors are advised to consult their**

**professional advisors concerning possible taxation or other consequences of purchasing, holding, selling, converting or otherwise disposing of the Shares under the laws of their country of incorporation, establishment, residence, or domicile, and in the light of their particular circumstances.**

The following statements on taxation are based on advice received by the Directors regarding the law and practice in force at the date of this Document. There is no guarantee that tax laws and practices will not change, so that the following general discussion of tax matters is no longer accurate. As is the case with any investment, there can be no guarantee that the tax position or proposed tax position prevailing at the time an investment is made in the Company will endure indefinitely.

For the purposes of this part of the prospectus, all references to the holding of shares in the Company should be regarded as references to the holding of shares in a particular Fund/Funds of the Company.

### **Taxation of the Company in Ireland**

On the basis that the Company is a UCITS it is outside the scope of Part 27 Chapter 1B of the Taxes Consolidation Act, 1997, as amended (“TCA”) dealing with the Irish real estate funds (“IREF”) tax regime. The Directors have been advised that, under current Irish law and practice, the Company qualifies as an investment undertaking for the purposes of Section 739B of the TCA so long as the Company is resident in Ireland for tax purposes. Accordingly, it is not chargeable to Irish tax on its income and gains.

The Company will only be subject to tax on chargeable events in respect of Shareholders who are Taxable Irish Persons (generally persons who are resident or ordinarily resident in Ireland for tax purposes – refer to Irish Residence and Ordinary Residence for Tax Purposes section for more detail).

A chargeable event occurs on, for example:

- (i) distribution payments made to Shareholders by the Company; and
- (ii) an encashment, repurchase, redemption, cancellation, transfer or deemed disposal of Shares (on the eighth anniversary of a Shareholder acquiring Shares and every subsequent eighth anniversary) or the appropriation or cancellation of Shares of a Shareholder by the Company for the purposes of meeting the amount of tax payable on a gain arising on a transfer,

but does not include, for example:

- (i) an exchange by a Shareholder, effected by way of an arm’s length bargain where no payment is made to the Shareholder, of Shares in the Company for other Shares in the Company
- (ii) any transaction in relation to Shares held in a clearing system recognised by the Irish Revenue Commissioners;
- (iii) certain transfers arising on a “scheme of reconstruction or amalgamation” (within the meaning of section 739H(1)) of the Taxes Act) or a “scheme of amalgamation” (within the meaning of 739HA(1) of the Taxes Act) of the Company or other Investment Undertaking(s);  
subject to certain conditions being fulfilled; and
- (iv) certain transfers between spouses/civil partners or former spouses/civil partners.

Where a chargeable event occurs, the Company is required to account for the Irish tax thereon.

If a Shareholder is not a Taxable Irish Person at the time a chargeable event arises no Irish tax will be payable on that chargeable event in respect of that Shareholder (subject to the comments below).

Where tax is payable on a chargeable event, subject to the comments below, it is a liability of the Company, which is recoverable by deduction or, in the case of a transfer and on the eight-year rolling chargeable event, by cancellation or appropriation of Shares from the relevant Shareholders. In certain circumstances, and only after notification by the Company to a Shareholder, the tax payable on the eight-year rolling chargeable event can at the election of the Company become a liability of the Shareholder rather than the Company. In such circumstances the Shareholder must file an Irish tax return and pay the appropriate tax (at the rate set out below) to the Irish Revenue Commissioners.

In the absence of the appropriate declaration being received by the Company that a Shareholder is not a Taxable Irish Person or if the Company has information that would reasonably suggest that a declaration is incorrect, and in the absence of written notice of approval from the Revenue Commissioners to the effect that the requirement to have been provided with such declaration is deemed to have been complied with (or following the withdrawal of, or failure to meet any conditions attaching to such approval), the Company will be obliged to pay tax on the occasion of a chargeable event (even if, in fact, the Shareholder is neither resident nor ordinarily resident in Ireland).

Where the chargeable event is an income distribution, tax will be deducted at the rate of 41%, or at the rate of 25% where the Shareholder is a company and the appropriate declaration has been made, on the amount of the distribution. Where the chargeable event occurs on any other payment to a Shareholder, not being a company which has made the appropriate declaration, on a transfer of Shares and on the eight-year rolling chargeable event, tax will be deducted at the rate of 41% on the increase in value of the shares since their acquisition. Tax will be deducted at the rate of 25% on such transfers where the Shareholder is a company and the appropriate declaration has been made. In respect of the eight-year rolling chargeable event, there is a mechanism for obtaining a refund of tax where the Shares are subsequently disposed of for a lesser value.

The Company may be exempt from the obligation to account for tax in respect of the eight-year rolling chargeable event if:

- (i) immediately before the chargeable event the value of the number of Shares in the Company, in respect of which any gains arising are treated as arising to the Company, on the happening of a chargeable event, is less than 10% of the value of the total number of Shares in the Company at that time, and
- (ii) the Company may make an election, in writing, to the Revenue Commissioners that it will make in respect of each year of assessment a statement (including where it is the case, a statement with a nil amount) to the Revenue Commissioners in electronic format approved by them, on or before 31 March in the year following the year of assessment, which specifies in respect of each Shareholder:
  - 1) the name and address of the Shareholder;
  - 2) the value at the end of the year of assessment of the Shares to which the Shareholder is entitled at that time; and
  - 3) such other information as the Revenue Commissioners may require.

The Company is obliged to notify the Shareholders concerned, in writing, if such an election has been made.

An anti-avoidance provision increases the 41% rate of tax to 60% for Irish Resident individuals or Ordinarily Resident individuals (80% where details of the payment/disposal are not correctly included

in the individual's tax return) if, under the terms of an investment in a fund, the investor or certain persons associated with the investor have an ability to influence the selection of the assets of the Company. Specific exemptions apply where the property invested in has been widely marketed and made available to the public or for non-property investments entered into by the investment undertaking. Further restrictions may be required in the case of investments in land or unquoted units deriving their value from land.

Other than in the instances described above, the Company should have no liability to Irish taxation on income or chargeable gains.

## Shareholders

### *Shares which are held in a Recognised Clearing System*

Any payments to a Shareholder or any encashment, redemption, cancellation or transfer of Shares held in a Recognised Clearing System will not give rise to a chargeable event in the Fund Shareholders holding Shares in a Recognised Clearing System may have an obligation to file a self-assessment tax return, and remit the appropriate amount of tax to Irish Revenue. Shareholders should seek their own tax advice in this regard). Thus, the Fund will not have to deduct any Irish taxes on such payments regardless of whether they are held by Shareholders who are Irish Residents or Ordinarily Resident in Ireland, or whether a non-resident Shareholder has made a Relevant Declaration. However, Shareholders who are Irish Resident or Ordinarily Resident in Ireland or who are not Irish Resident or Ordinarily Resident in Ireland but whose Shares are attributable to a branch or agency in Ireland may still have a liability to account for Irish tax on a distribution or encashment, redemption or transfer of their Shares.

To the extent any Shares are not held in a Recognised Clearing System at the time of a chargeable event (and subject to the discussion in the previous paragraph relating to a chargeable event arising on a deemed disposal), the following tax consequences will typically arise on a chargeable event

### *Shareholders who are neither Irish Residents nor Ordinarily Resident in Ireland*

Shareholders who are neither resident nor ordinarily resident in Ireland in respect of whom the appropriate declarations have been made will not be subject to tax on any distributions from the Company or any gain arising on redemption, repurchase or transfer of their shares, provided the shares are not held through a branch or agency in Ireland and the shares, if unlisted, do not derive the greater part of their value from Irish land or mineral rights. Where the Shares are not denominated in Euro, such Shareholders may be liable to corporation tax on foreign currency gains upon the cancellation, redemption, repurchase or transfer of Shares.

To the extent that a Shareholder is acting as an Intermediary on behalf of persons who are neither Irish Resident nor Ordinarily Resident in Ireland, no tax will have to be deducted by the Fund on the occasion of a chargeable event provided that the Intermediary has made a Relevant Declaration that he/she is acting on behalf of such persons and the Fund is not in possession of any information which would reasonably suggest that the information contained therein is no longer materially correct.

Refunds of tax where a relevant declaration could be made but was not in place at the time of a chargeable event are generally not available except in the case of certain corporate Shareholders within the charge to Irish corporation tax.

### *Shareholders who are Irish Residents or Ordinarily Resident in Ireland*

Shareholders who are Irish Resident or ordinarily resident or who hold their shares through a branch or agency in Ireland may have a liability under the self-assessment system to pay tax, or further tax, on any distribution or gain arising from their holdings of Shares. In particular where the Company has elected to not deduct tax at the occasion of the eight-year rolling chargeable event a Shareholder will have an obligation to file a self-assessment tax return and pay the appropriate amount of tax to the Irish Revenue Commissioners.

Refunds of tax where a relevant declaration could be made but was not in place at the time of a chargeable event are generally not available except in the case of certain corporate Shareholders within the charge to Irish corporation tax.

### **Exempt Irish Resident Shareholders**

The Company will not be required to deduct tax in respect of the following categories of Irish Resident Shareholders, provided the Company has in its possession the necessary declarations from those persons (or an intermediary acting on their behalf) and the Company is not in possession of any information which would reasonably suggest that the information contained in the declarations is not, or is no longer, materially correct. A Shareholder who comes within any of the categories listed below and who (directly or through an intermediary) has provided the necessary declaration to the Company is referred to herein as an “Exempt Irish Resident”:

1. a pension scheme which is an exempt approved scheme within the meaning of Section 774 TCA, or a retirement annuity contract or a trust scheme to which Section 784 or Section 785 TCA, applies;
2. a company carrying on life business within the meaning of Section 706 TCA;
3. an investment undertaking within the meaning of Section 739B(1) TCA,
4. an investment limited partnership within the meaning of Section 739J TCA;
5. a special investment scheme within the meaning of Section 737 TCA;
6. a charity being a person referred to in Section 739D(6)(f)(i) TCA;
7. a qualifying management company within the meaning of Section 739B(1) TCA;
8. a unit trust to which Section 731(5)(a) TCA applies;
9. a person who is entitled to exemption from income tax and capital gains tax under Section 784A(2) TCA where the shares held are assets of an approved retirement fund or an approved minimum retirement fund;
10. a person who is entitled to exemption from income tax and capital gains tax by virtue of Section 787I TCA, and the shares are assets of a PRSA;
11. a credit union within the meaning of Section 2 of the Credit Union Act, 1997;
12. the National Treasury Management Agency;
13. the National Asset Management Agency;
14. the Motor Insurers’ Bureau of Ireland in respect of an investment made by it of moneys paid to the Motor Insurers’ Insolvency Compensation Fund under the Insurance Act 1964 (amended by the Insurance (Amendment) Act 2018);
15. a company within the charge to corporation tax in accordance with Section 110(2) TCA (securitisation companies);
16. in certain circumstances, a company within the charge to corporation tax in respect of payments made to it by the Company; or
17. any other person who is resident or ordinarily resident in Ireland who may be permitted to own Shares under taxation legislation or by written practice or concession of the

Revenue Commissioners without giving rise to a charge to tax in the Company or jeopardising the tax exemptions associated with the Company.

There is no provision for any refund of tax to Shareholders who are Exempt Irish Residents where tax has been deducted in the absence of the necessary declaration. A refund of tax may only be made to corporate Shareholders who are within the charge to Irish corporation tax.

### **Dividend Withholding Tax**

Distributions paid by the Company are not subject to Irish dividend withholding tax provided the Company continues to be a collective investment undertaking as defined in Section 172A(1) of the Taxes Act.

Dividends received by the Company from investment in Irish equities may be subject to Irish dividend withholding tax at the standard rate of 25%. However, the Company uses reasonable efforts to make a declaration to the payer that it is a collective investment undertaking beneficially entitled to the dividends which it will entitle the Company to receive such dividends without the deduction of Irish dividend withholding tax.

### **Stamp Duty**

No Irish stamp duty will be payable on the subscription, transfer or redemption of Shares given the Company is not an IREF and provided that no application for Shares or repurchase or redemption of Shares is satisfied by an in specie transfer of any Irish situated property or any right over or interest in such property, or any stocks or marketable securities of a company (other than a company which is an investment undertaking within the meaning of Section 739B TCA or a qualifying company within the meaning of Section 110 TCA) which is registered in Ireland.

### **Capital Acquisitions Tax**

The disposal of Shares may be subject to Irish gift or inheritance tax (“Capital Acquisitions Tax”). However, provided that the Fund falls within the definition of investment undertaking (within the meaning of Section 739B (1) of the Taxes Act), the disposal of Shares by a Shareholder is not liable to Capital Acquisitions Tax provided that (a) at the date of the gift or inheritance, the donee or successor is neither domiciled nor Ordinarily Resident in Ireland; (b) at the date of the disposition, the Shareholder disposing (“disponer”) of the Shares is neither domiciled nor Ordinarily Resident in Ireland; and (c) the Shares are comprised in the gift or inheritance at the date of such gift or inheritance and at the valuation date.

With regard to Irish tax residency for Capital Acquisitions Tax purposes, special rules apply for non-Irish domiciled persons. A non-Irish domiciled donee or disponer will not be deemed to be resident or ordinarily resident in Ireland at the relevant date unless:

1. that person has been Resident in Ireland for the 5 consecutive years of assessment immediately preceding the year of assessment in which that date falls; and
2. that person is either Resident or Ordinarily Resident in Ireland on that date.

### ***Shareholder Reporting***

Pursuant to Section 891C of the Taxes Act and the Return of Values (Investment Undertakings) Regulations 2013, the Fund is obliged to report certain details in relation to Shares held by investors to the Irish Revenue Commissioners on an annual basis. The details to be reported include the name, address, and date of birth if on record of, and the value of the Shares held by, a Shareholder. The details to be reported also include the tax reference number of the Shareholder (being an Irish tax reference number or VAT registration number, or in the case of an individual, the individual's PPS number) or, in the absence of a tax reference number, a marker indicating that this was not provided. No details are to be reported in respect of Shareholders who are:

1. Exempt Irish Investors (as defined above).
2. Shareholders who are neither Irish Resident nor Ordinarily Resident in Ireland (provided the Relevant Declaration has been made); or
3. Shareholders whose Shares are held in a Recognised Clearing System.

### *Irish Residence and Ordinary Residence for Tax Purposes*

#### Residence - Corporate Investors

Prior to Finance Act 2014, company residence was determined with regard to the long-established common law rules based on central management and control. These rules were significantly revised in Finance Act 2014 to provide that a company incorporated in the State will be regarded as resident for tax purposes in the State unless it is treated as resident in a treaty partner country by virtue of a double taxation treaty. While the common law rule based on central management and control remains in place, it is subject to the statutory rule for determining company residence based on incorporation in the State set out in the revised section 23A TCA 1997.

The new incorporation rule for determining the tax residence of a company incorporated in the State will apply to companies incorporated on or after 1 January 2015. For companies incorporated in the State before this date, a transition period will apply until 31 December 2020.

#### Residence – Individual Investors

An individual will be regarded as being resident in Ireland for a tax year if s/he:

- (i) spends 183 days or more in the State in that tax year; or
- (ii) has a combined presence of 280 days in the State, taking into account the number of days spent in the State in that tax year together with the number of days spent in the State in the preceding year.

Presence in a tax year by an individual of not more than 30 days in the State will not be reckoned for the purpose of applying the two-year test. Presence in the State for a day means the personal presence of an individual at any time during the day.

#### Ordinary Residence – Individual Investors

The term “ordinary residence” as distinct from “residence”, relates to a person's normal pattern of life and denotes residence in a place with some degree of continuity.

An individual who has been resident in the State for three consecutive tax years becomes ordinarily resident with effect from the commencement of the fourth tax year.

An individual who has been ordinarily resident in the State ceases to be ordinarily resident at the end of the third consecutive tax year in which s/he is not resident. Thus, an individual who is resident and ordinarily resident in the State in 2023 and departs from the State in that tax year will remain ordinarily resident up to the end of the tax year in 2026.

#### Residence - Trust Investors

A trust will generally be regarded as resident in Ireland where all of the trustees are resident in Ireland. Trustees are advised to seek specific tax advice if they are in doubt as to whether the trust is resident in Ireland.

#### Intermediary

This means a person who:

- (i) carries on a business which consists of, or includes, the receipt of payments from an investment undertaking resident in Ireland on behalf of other persons; or
- (ii) holds units in an investment undertaking on behalf of other persons.

#### **Anti- Tax Avoidance Directive 1 and Anti-Tax Avoidance Directive 2**

The EU Directives 2016/1164 of 12 July 2016 and 2017/952 of 29 May 2017 (“ATAD 1” and “ATAD 2”, respectively) were adopted into Irish law through Finance Act 2018 (signed 19 December 2018), Finance Act 2019 (signed 22 December 2019) and Finance Act 2021 (signed 21 December 2021). The implementation of these EU Directives encompassed the introduction of several anti-tax avoidance measures, namely

- (i) Controlled foreign company rules, effective from 1 January 2019,
- (ii) Exit tax rules, effective from 10 October 2018,
- (iii) Anti-hybrid rules, applying to all payments made after 1 January 2020 and Reverse hybrid rule applies to tax periods commencing on or after 1 January 2022, and
- (iv) Interest limitation rules, applying to accounting periods commencing on or after 1 January 2022. Following review by the Irish government, no amendments were deemed required to Ireland’s existing General Anti-Avoidance Rules to comply with ATAD provisions.

The Company is not expected to be materially impacted by ATAD 1 and ATAD 2, and external advice has been sought as required to document the position.

#### **EU Mandatory Disclosure Regime**

The EU revised the Council Directive (EU)2011/16/EU on administrative cooperation in the field of taxation, as amended by Council Directive (EU) 2018/822 of 25 May 2018 (“DAC 6”), the result of which is that a Mandatory Disclosure Regime (“MDR”) came into effect on 25 June 2018. The MDR requires taxpayers and intermediaries to report details of reportable cross-border arrangements to their home tax authorities. This information is automatically exchanged among the tax authorities of the EU Member States. The Directive was transposed into Irish law in December 2019, effectively amending the Anti-Avoidance rules of Ireland’s Taxes and Consolidation Act (TCA) by transposing DAC6 as an addendum to the Domestic Mandatory Disclosure rules.

DAC6 creates an obligation for persons referred to as “intermediaries” to make a return to the relevant EU tax authorities of information regarding certain cross-border arrangements with particular



characteristics, referred to as “hallmarks”, from 1 July 2020 onwards. For reportable arrangements that are made available for implementation, that are ready for implementation, or for which the first step of implementation was made on or after 1 January 2021, the standard 30-day period (for reporting by intermediaries or, if applicable, relevant taxpayers) and the standard 10-day period (for notifications by intermediaries with a reporting exemption, i.e., LPP) apply. A tax authority receiving such a report must automatically exchange that information with tax authorities in other EU Member States and the UK. In certain circumstances, instead of an intermediary, the obligation to report may pass to the relevant taxpayer of a reportable cross-border arrangement.

The transactions contemplated under this Prospectus may fall within the scope of DAC6 and thus may qualify as reportable cross-border arrangements. If that were the case, any person that falls within the definition of an “intermediary” (this could include the Administrator, the AIFM, the Investment Manager, the legal and tax advisers of the Fund etc.) or, in certain circumstances, the relevant taxpayer of a reportable cross-border arrangement (this could include Shareholder(s)) may have to report information in respect of the transactions to the relevant tax authorities. In addition, any taxpayer who is an individual and who is declared in a DAC6 report automatically becomes a chargeable person and would be required to provide additional details in their annual tax declaration. Please note that this may result in the reporting of certain Shareholder information to the relevant tax authorities.

Shareholders and prospective investors should consult their own tax advisor regarding the requirements of DAC6 with respect to their own situation.

### **Austrian Taxation**

The following information is intended to give a general overview of the principles of Austrian taxation on income derived from investment funds for investors subject to unlimited tax liability in Austria based on the legal status.

Investment funds are transparent according to Austrian tax law. This means that income from the Company is not taxed at the Company level but at investor level (tax transparency).

The Company’s income is generally taxable when it is distributed to the investors. Income, which is not distributed, is taxable as deemed distributed income (“DDI”) once a year.

The Investment Fund Act 2011 provides for two tax categories for foreign investment funds:

1. Investment funds which have a tax representative, who reports the tax categorisation of distributions and DDI to the Oesterreichische Kontrollbank (“OeKB”) (reporting funds); and
2. Investment funds, which do not have a tax representative and which are therefore subject to the lump-sum taxation (black funds).

Shareholders: Private Investors

#### *Taxation of the Company’s income*

The Company’s taxable income consists of:

1. the ordinary income (i.e., interest income, dividend income, other ordinary income minus the Company’s expenses); and
2. the extraordinary income (i.e., realised capital gains from the sale of the Company’s assets and income from derivative instruments).

For private investors only 60% of the accumulated extraordinary income is taxable. In case of distributions 100% of the distributed extraordinary income is taxable.

Negative extraordinary income (realised capital losses after netting with realised capital gains) can be credited against ordinary income (dividends, interest and other income minus expenses). If capital losses exceed the net investment income, the exceeding amount can be carried forward at the Share Class level. Further, negative net investment income can be offset against realised capital gains and carried forward if the negative net investment income exceeds the realised capital gains. In the following financial years, these carried forward amounts have to be offset, firstly against realised capital gains, and after that against the net investment income.

The applicable tax rate for private investors on the Company's income is generally 27.5%. In cases where the Shares are held on Austrian deposit, the 27.5% tax on the DDI and the distributed income is withheld by the Austrian depository bank at the time the DDI is reported to OeKB (i.e., at any time up to 7 months after the Company's financial year end). Where the Shares are held on foreign deposit, the DDI and the distributed income must be included in the private investor's personal income tax return.

#### *Sale of Shares*

Where private investors sell Shares, the difference between the sale price and the purchase price is subject to 27.5% tax irrespective of the holding period. In order to avoid a double taxation of the DDI (i.e., annual taxation and taxation as part of the gain derived from the sale of the Company shares) the Share's purchase price is increased annually by the taxed DDI. It should be noted that the sales (preliminary) charge must not be considered as incidental acquisition cost.

If the Shares are held on Austrian deposit, the 27.5% tax on the capital gain shall be withheld by the Austrian depository bank. Where the Shares are held on foreign deposit, the capital gain must be included in the private investor's personal income tax return.

The capital gains taxation at 27.5% tax only applies to the sale of Shares bought after 31 December 2010. Capital gains from the sale of Shares bought before 1 January 2011 are generally tax free.

#### Shareholders: Individuals Holding Shares as Business Property

If Shares are held by individuals as business property (sole proprietors or partnerships), the tax rules as described above for private investors are generally applicable with the following exceptions:

1. 100% of the accumulated extraordinary income is taxable at 27.5% (i.e., no 40% exemption available).
2. Individuals holding the Shares as business property have to include the extraordinary income and the realised capital gains or losses from the sale of Shares in their income tax return in any case. Any tax withheld on extraordinary income and on capital gains by the Austrian depository bank will be credited on the individual's income tax.
3. The sales (preliminary) charge can be considered as an incidental acquisition cost and has to be included in the individual's income tax return.

## Shareholders: Corporate Investors

Ordinary income and extraordinary income are subject to 25% corporate income tax and must be included in the corporate income tax return of the corporation. If the corporate investor sells Shares, the difference between the purchase price and the sales price less already taxed DDI is subject to 25% corporate income tax (irrespective of the holding period) and must be included in the corporate income tax return.

Corporate investors can avoid the withholding tax deduction by providing the Austrian bank with a certificate of exemption. If no certificate of exemption is provided, the deducted withholding tax can be credited against corporate income tax.

### **Proof of Taxable Income**

The tax categorisation of DDI have to be calculated by an Austrian tax representative on an annual basis and reported to the OeKB within seven months after the fund's financial year-end.

The withholding tax on the DDI is deducted by the Austrian depository bank, once the DDI is published by the OeKB. The tax figures are published on the OeKB's website ([www.profitweb.at](http://www.profitweb.at)).

If an investment fund is not registered with the OeKB, the lump-sum taxation applies as at calendar year-end. In this case, 90% of the increase in the NAV over the calendar year, but at least 10% of the NAV at calendar year-end, is subject to taxation.

### **German Taxation**

#### Taxation in Germany

The statements regarding the tax regulations are not to be considered exhaustive. They are not a complete analysis of all tax considerations relating to the holding of a Relevant Fund or Share Class. They do not constitute legal or tax advice. The comments are limited to certain aspects of current German tax law and practice and may not apply to certain types of investors. The following sections provide a very brief overview of certain German income tax consequences of purchasing, owning and disposing of shares in the Fund / Share Class at the level of the Shareholders that are subject to tax in Germany.

According to the flat rate tax, introduced by the Corporate Tax Reform Act 2008 and which came into effect on 1 January 2009, all capital income within the meaning of § 20 German Income Tax Act of private German Shareholders will be subject to the flat rate tax independent of the duration of holding periods which is levied at a rate of 25% as well as the solidarity surcharge of (5.5% thereof) and the church tax, if applicable.

### **German Investment Fund Tax Regime**

On 1 January 2018 the new German Investment Tax Act ("GITA") regime became effective. The new tax regime differs between investment funds and special-investment funds, which are investment funds that have to fulfil certain requirements and are generally eligible for institutional and corporate investors only. For investment funds, a new opaque tax regime applies, whereas for special-investment funds, the transparent tax regime applies. All Funds of the Company will be treated as investment funds in accordance with the GITA. The special investment fund tax regime in accordance with the GITA will not apply.

Therefore, the following statements refer to the rules applicable to investment funds only. The new investment fund tax regime introduces taxation rules at the level of the Fund in addition to new rules regarding the taxation at the level of the Shareholder.

### *The Fund*

From 1 January 2018 domestic and foreign investment funds will be subject to corporate income tax with respect to certain German source income. Primarily German dividend income and German real estate income will be subject to German corporate income tax at fund level. In the case of German dividend income, the German tax will generally be withheld at source. For investment funds that applied for the fund status certificate a reduced tax rate of 15% (including 5.5% solidarity surcharge) will be applicable. The Company will use commercially reasonable efforts to apply for the fund status certificate for each Fund upon Fund formation. In the case that the Fund derives German source income which is not subject to withholding tax at source the Fund is obliged to file a German corporate income tax return.

### The Shareholder

To account for the systematic change of the investment fund taxation regime, the GITA stipulates a “fictitious” disposal of shares as of 31 December 2017 and a “fictitious” reacquisition of the same as of 1 January 2018. The capital gains will be determined and will be subject to taxation according to the old GITA in its version in force until 31 December 2017. The capital gains of the “fictitious” disposal of shares as of 31 December 2017 will only be taxed when the Shareholder actually sells / redeems the shares. All capital gains derived for the period from 1 January 2018 until the disposal of the shares will be subject to the new taxation rules according to the GITA.

Capital gains of shares acquired before 1 January 2009 (“grandfathered shares”) derived from the “fictitious” disposal as of 31 December 2017 are tax free for private investors. Any capital gains derived from grandfathered shares for the period from 1 January 2018 until the disposal / redemption of the shares are subject to tax for private investors provided the capital gains exceed a tax allowance in the amount of EUR 100.000,00 (one-off tax allowance). However, these capital gains will be subject to withholding tax even if the tax allowance is not or just partially utilized. Therefore, the Shareholder needs to claim the tax allowance in the course of the tax assessment. These rules are not applicable to business Shareholders who hold their shares as part of their business assets.

Under the rules of the GITA, Shareholders will generally be taxed on a cash flow basis (i.e., upon distribution and upon disposal or redemption of the shares). In addition, the Shareholder will be taxed based on the so-called pre lump-sum amount (“Vorabpauschale”) on an annual basis provided the value of the Fund increased during the calendar year. The pre lump-sum amount applies once a year. The basis of the determination of the pre lump-sum amount is the so-called base income (“Basisertrag”) which will be calculated based on 70% of the interest rate published by the German Ministry of Finance and the first redemption price of the respective calendar year. The base income is limited to the surplus of the difference between the first and the last redemption price of the respective calendar year plus distributions. The pre lump-sum amount is the amount by which the distributions of the Fund in a calendar year fall short of the base income. The pre lump-sum amount may not be negative. The pre lump-sum amount is deemed to be received by the shareholder on the first business day of the following calendar year. The sum of pre lump-sum amounts that was subject to tax at Shareholder level will reduce the capital gain derived from the disposal of the shares in the Fund / Share Class.

All taxable investment income (i.e., distribution, capital gains upon disposal or redemption, pre-lump sum amount) qualifies as capital investment income in the sense of Sec. 20 para. 1 no. 3 German Income Tax Act (“ITA”) and will be subject to capital income withholding tax of 25% (plus solidarity surcharge and church tax, if applicable) for private investors. Generally, the tax is collected by way of a German withholding tax. In case the Shares are not held in a German depositary or in case the shares are held as part of business assets, German Shareholders are obliged to declare the investment income in their income tax returns. For business investors (i.e., shareholders falling either under the rules of the ITA or the German Corporate Income Tax Act (CITA) and holding their fund shares as part of the business assets) the personal tax rate applies.

Shareholders may benefit from a partial tax exemption according to Sec. 20 para. 1 – 3 of the GITA depending on the fund type (i.e., ‘equity funds’, ‘mixed funds’ or ‘real estate funds’). The applicable fund type is linked to the investment strategy of the fund and is generally stated in its terms and conditions. The following table shows the respective fund types including the necessary investment thresholds and the applicable partial tax exemption rate per investor type:

Fund types according to the GITA	Partial tax exemption rate	Partial tax exemption rate	Partial tax exemption rate
	Private Investors	Business Investors (ITA)	Business Investors (CITA)
Equity Funds more than 50% in equity participations acc. to Sec. 2 para. 8	30%	60%	80%
Mixed Funds at least 25% in equity participations acc. to Sec. 2 para. 8 GITA	15%	30%	60%
Real Estate Funds more than 50% in real estate acc. to Sec. 2 para. 9 GITA	60%	60%	60%
Real Estate Funds (foreign) more than 50% in foreign real estate acc. to Sec. 2 para. 9 GITA	80%	80%	80%
Other Funds	no partial tax exemption	no partial tax exemption	no partial tax exemption

The partial tax exemption applies on all investment income (i.e., distribution, capital gains upon disposal or redemption of the shares and the so-called pre lump-sum amount (“Vorabpauschale”)). The percentage of the partial tax exemption depends on the fund type and the investor type.

The German Fund type classification of each Fund pursuant to the GITA is set out in the relevant Supplement.

#### Tax Risk

The legal and fiscal treatment of funds may change in a way that is unforeseeable and beyond the reasonable control of the Company.

For German tax purposes the Funds are classified as equity, mixed, real estate, or bond (other) funds based upon the securities held by the Fund and the categorisation of the securities as defined in the GITA.

Changes in the investment strategy of a Fund are not anticipated. However, such a change could cause a breach of the equity thresholds as defined in the GITA which leads to a loss of the benefit of the respective partial tax exemption for the Shareholder. Such a change in fund status will also lead to a fictitious sale of the shares and a fictitious acquisition of the shares. However, the capital gains of such a fictitious sale will only be taxed when the Shareholder actually sells or redeems the shares. The rules of the fictitious sale upon change of the fund status for German tax purposes allows for an allocation of the valid partial tax exemption rate for the respective holding period.

An audit by the German tax authorities could also lead to a change of the fund status for German tax purposes. Such a change may impact the historic and future taxation of the Shareholder.

## **Italian Taxation**

### *Income taxes*

Income from foreign funds is subject to a different taxation depending on the categories in which the shareholders can be classified.

In particular, there are three relevant categories of shareholders:

- A) **Non-Business investors:** Private investors and Non-commercial entities (including foundations) holding the Shares not in connection with a business activity.
- B) **Business-investors:** Individuals holding the Shares in connection with a business activity and Corporate Investors.
- C) **Exempt Institutional Investors:** Italian UCITS funds and AIFs, Real Estate funds and pension funds.

### **Non-Business investors**

The investment in Shares may generate a taxable income in connection with the following events:

- a) Distributions: the taxable income is the amount of the distribution, up to the amount that is not characterized by the Investment Manager as capital repayment;
- b) Redemption of the Shares or liquidation of the fund: the taxable income is determined as the the positive difference between the redemption value of the Shares and their average weighted subscription/purchase price;
- c) Sale of the Shares: the taxable income is the positive difference between the sale price of the Shares and their average weighted subscription/ purchase price;
- d) Transfer of the Shares to a different shareholder by inheritance, gift or any other event different from sale: the taxable income is the positive difference between the value of the Shares as at the date of the transfer and their average weighted subscription/ purchase price;
- e) Switch between Funds: the taxable income is the positive difference between the value of the Shares of the switched fund as at the date of the switch and their average weighted subscription/ purchase price.

The taxable income is subject to a final withholding tax at 26% that is applied by the Italian paying agent appointed with the placing of the Shares or, in case of disposal of the Shares, by the financial

intermediary in charge of the trading. In the absence of a paying agent, the withholding tax (“WHT”) is applied by any Italian financial intermediary collecting the income on behalf of the shareholder. If no financial intermediary intervenes in the collection of the income, the shareholder must include the income in its own tax return and apply the 26% taxation.

If the Fund derives (directly or indirectly through the investment in other investment funds) income from the investment in certain eligible government bonds and equivalent securities, the portion of the income that is deemed to derive from such bonds is subject to the 26% WHT only on 48.08% of the relevant amount. This results in a reduced source WHT rate of 12.50%. The Company uses reasonable efforts to provide the calculation of the percentage of eligible assets held by the Fund for the purposes of the reduction in the rate of WHT.

Any negative difference arising from the redemption, disposal, transfer by gift/inheritance, or switch of the Shares or liquidation of the Fund by reference to the average weighted subscription/purchase price of the Shares can be used to offset capital gains on other financial assets or carried forward for 4 years.

### **Business investors**

The same taxable events and rules for the determination of the taxable income described in relation to Non-Business Investors also apply to individuals holding the Shares in connection with a business activity and to corporate shareholders.

The taxable income arising from the Fund must be included by these shareholders in the respective business taxable income subject to the statutory tax rates (up to 43% for individuals, 24% to 27.5% for corporate investors).

In the event that the paying agent appointed for placement of the Shares or any other Italian financial intermediary collecting the income from the fund applies the 26% WHT on the income from the Fund, this WHT is levied as an advance payment on account of the final liability, i.e., the shareholder can deduct the WHT suffered at source from its overall income tax due on business income.

An exemption from the WHT is provided for insurance companies holding the Shares to back the actuarial reserves of a life insurance business.

Losses realized from the disposal or redemption of the Shares or liquidation of the Fund are included in the investor’s taxable income and deducted accordingly. Moreover, corporate investors must include in their business taxable income any gain/loss resulting from the year-end valuation of the Shares in compliance with the applicable accounting principles.

### **Exempt Institutional Investors**

Any income from the investment in Shares is exempt from taxation in Italy at the level of Italian UCITS, AIF and Real Estate funds.

For Italian pension funds, income and losses arising from the investment in the Shares are exempt from the 26% WHT but must be included in the pension fund’s yearly taxable base subject to a 20% taxation.

### ***Inheritance and gift taxes***

Shares of foreign funds are subject to the Italian Inheritance and Gift tax.

However, an exemption from the Inheritance tax is provided if the fund invests in Government bonds issued by Italy or other EU/EEA countries or certain Supranational Entities.

In such a case, an exemption from Inheritance tax applies in relation to the portion of the overall market value of the fund shares corresponding to the aforesaid bonds as at the date of the death of the shareholder. The Company uses reasonable efforts to provide the calculation of the percentage of eligible assets held by the Fund for the purposes of the Inheritance tax exemption. The exemption does not apply to Gift tax.

### ***Wealth tax***

If the Shares are held under the custody, administration or management of an Italian financial intermediary, this intermediary has to apply the Italian tax (“Imposta di bollo”) on the value of the Shares as resulting from the periodical statements issued to the shareholder or, in the absence of periodical statements, as at the end of the year. The tax is levied at the annual rate of 0.2%, capped at EUR 14,000 for investor other than individuals.

An exemption is provided for several categories of investors (e.g., banks, financial companies, insurance companies, investment and pension funds, investment fund managers).

If the Shares are held outside Italy and are not under the administration or management of an Italian financial intermediary, they are subject to the Italian wealth tax on foreign financial investments (“IVAFE”). This tax applies only to individuals and non-commercial entities, at the annual rate of 0.2%, capped at EUR 14,000 for non-commercial entities, on the value of the shares as of 31 December of each year (or at the end of the holding period if earlier).

The shareholder has responsibility to levy the tax and report it in its tax return and should consult its tax advisor for further information.

### **Swiss Taxation**

The following information gives a general overview of the principles of Swiss taxation on income derived from investment funds for investors subject to unlimited tax liability in Switzerland. If the fund reports its Swiss taxable income and Net Asset Value to the Swiss Federal Tax Authority’s (“SFTA”) taxable values list (“**Kursliste**”, see below), it is these values that are determinant for Swiss tax purposes for a Swiss resident individual. If a fund does not report these amounts, the competent Cantonal tax authority may dispute the investor’s calculations or assess a deemed distribution determined at their discretion.

#### ***Swiss Income and Wealth Tax Considerations***

##### **Individual investors**

Swiss resident private investors who are not taxed on a lump-sum basis are liable to income tax on their worldwide income, including net investment income.



The general tax rules for such investors who do not qualify as professional securities dealers ("gewerbsmässige Wertschriftenhändler"), and who are subject to unlimited Swiss tax liability, are described as follows.

The market value of the investment in the Fund, at the end of each fiscal year of the Shareholder, is subject to cantonal and communal tax on wealth.

In general, Swiss funds are taxed on a transparent basis (i.e., each investor is liable to tax on their proportionate share of the underlying income). Foreign funds are generally also taxed on the same basis. The rules are different for distributing and accumulating funds, as determined by Swiss tax principles.

On liquidation, Swiss private investors will be subject to taxation on their share of the liquidation proceeds received from the Fund less the following items: (i) share in the capital of the fund, (ii) capital gains realised and (iii) accumulated income that has already been subject to the Swiss income tax.

#### Sale and redemption of Shares

Capital gains on the sale of Shares held for private investment purposes are in principle not subject to direct federal tax and cantonal / communal taxes. Should the investment activities of a private investor be qualified as having a professional or commercial purpose ('gewerbsmässiger Wertschriftenhändler'), any capital gains and losses realised by the Fund will be considered as part of ordinary taxable income.

Redemption of Shares held for private investment purposes, is also not subject to direct federal tax and cantonal/communal.

#### Corporate investors and private investors (investment as "business asset")

Swiss resident individuals are liable to income taxes on all profits derived from the Fund. Such investors would have to include their income and capital gains in their financial statements, taking into account Swiss accounting principles. The financial statements are the basis for the tax assessments of Swiss corporate investors.

Certain Swiss resident corporate investors such as charities and pension funds, are in general tax exempt with respect to direct federal and cantonal/communal tax.

#### Swiss Securities Transfer Tax

The issue of Shares in the Fund is subject to 0.15% Swiss Securities Transfer Tax, calculated on the consideration for the Shares of the Fund issued, provided a Swiss securities dealer according to Swiss stamp duty law is involved in an issuance as an intermediary. A Swiss securities dealer acting as an intermediary is liable to levy Swiss Securities Transfer Tax on every counterparty (without regard to the counterparty's country of residence) that is neither a registered Swiss securities dealer nor an exempt party. The full rate of the Securities Transfer Tax is 0.30%, but this is reduced to 0.15% if one of the counterparties is an exempt party and is eliminated entirely if both counterparties are exempt. Since the Fund as the issuer of the Shares is an exempt counterparty, a Swiss securities dealer would levy Securities Transfer Tax at 0.15% unless the investor can show that it is also exempt. Where applicable the cost of the Securities Transfer Tax, 0.15% of the invested capital, is borne by the investor.

In the event of any subsequent purchase, sale or transfer of Shares in the Fund through a Swiss securities dealer, in general, a Security Transfer Tax of 0.30% will be levied (i.e., the full rate) in so far as neither the buyer or the seller is a registered Swiss securities dealer nor an exempt party.

Redemption of Shares in the Fund is not subject to any Securities Transfer Tax as long as the Shares are cancelled.

#### Withholding Tax on fund distributions

A Fund established outside of Switzerland should not be subject to Swiss withholding taxes provided that the units are not issued jointly with a Swiss party.

#### Swiss Fund Tax Reporting

For Swiss tax purposes, the amount of income and capital gains distributed and/or retained by the Fund in each year, as well as the Net Asset Value of the Fund for Swiss tax purposes, can be reported to the SFTA annually. Whilst Swiss-resident funds and foreign funds marketed to Swiss retail investors are required to do such reporting, foreign funds that are not marketed to Swiss retail clients often choose to do so in order to ensure that their Swiss resident investors can benefit from the tax-free distribution of capital gains.

The SFTA publishes this information on the taxable values list (“**Kursliste**”), which amount is generally determinative for Federal, Cantonal and Communal income tax and Cantonal and Communal wealth tax purposes. The Company uses reasonable efforts to publish the taxable values annually on the Kursliste. Swiss resident private investors should therefore verify their taxable amounts against this list before submitting their tax return.

#### **Luxembourg Taxation**

The following sections do not purport to deal with all of the tax consequences applicable to the Luxembourg resident Shareholders (*Luxembourg Funds* and *Luxembourg Pension Funds*) of the Company or to all categories of investors, some of whom may be subject to special rules and do not constitute tax advice. Luxembourg resident Shareholders and prospective investors should consult their own tax advisors on the tax implications for them of purchasing, holding, selling, converting, or otherwise disposing of the shares under the laws of Luxembourg in the light of their particular circumstances.

Any reference in the present section to a tax, duty, levy impost, or other charge or withholding of a similar nature refers to Luxembourg tax law and/or concepts only. Also, please note that a reference to Luxembourg income tax encompasses corporate income tax (*impôt sur le revenu des collectivités*), municipal business tax (*impôt commercial communal*) generally. Corporate Shareholders may further be subject to net wealth tax (*impôt sur la fortune*) as well as other duties, levies, or taxes.

#### *Shareholders being Luxembourg Funds*

*Undertakings Collective Investment in Transferable Securities (“UCITS”) and Part II Undertakings for Collective Investment (“Part II UCI”)*

Luxembourg UCITS and Part II UCI Funds, governed by the Amended Luxembourg Law of 17 December 2010 on Undertakings for Collective Investment and recent Regulations and Circulars relating thereto, are exempt from Luxembourg corporate income tax, municipal business tax, and net

wealth tax. Income received by a UCITS or Part II UCI from the Company should be exempt from the aforementioned Luxembourg taxes. These entities are only subject to a subscription tax at a rate of 0.05%, which is calculated on the basis of the Net Asset Value of the fund at the end of each quarter. Reductions and exemptions are available for certain types of assets.

No Luxembourg withholding taxes are levied on distributions made by Luxembourg UCITS and Part II UCI Funds.

*Specialised Investment Funds ("SIF")*

Luxembourg SIF Funds, governed by the Amended Luxembourg Law of 13 February 2007 on Specialized Investment Funds, are exempt from Luxembourg corporate income tax, municipal business tax, and net wealth tax. Income received by a Luxembourg SIF from the Company should be exempt from the aforementioned Luxembourg taxes. These entities are only subject to a subscription tax at a rate of 0.01%, which is calculated on the basis of the Net Asset Value of the fund at the end of each quarter. Reductions and exemptions are available for certain types of assets.

No Luxembourg withholding taxes are levied on distributions made by Luxembourg SIFs.

*Reserved Alternative Investment Funds ("RAIF")*

Luxembourg RAIF Funds, governed by the Amended Luxembourg Law of 23 July 2016 on Reserved Alternative Investment Funds, may opt for the SIF or Investment Company in Risk Capital ("SICAR") tax regime.

A RAIF opting for the SIF tax regime is exempt from Luxembourg corporate income tax, municipal business tax, and net wealth tax. Income received by a Luxembourg RAIF opting for the SIF tax regime from the Company should be exempt from the aforementioned Luxembourg taxes. Luxembourg RAIFs opting for the SIF tax regime are only subject to a subscription tax at a rate of 0.01%, which is calculated on the basis of the Net Asset Value of the fund at the end of each quarter. Reductions and exemptions are available for certain types of assets.

A Luxembourg RAIF opting for the SICAR tax regime is in principle subject to Luxembourg corporate income tax, municipal business tax, and net wealth tax. However, income and capital gains derived from investments made into risk capital are exempt from Luxembourg corporate and municipal business taxes. Luxembourg RAIFs opting for the SICAR tax regime are not subject to subscription taxes.

No Luxembourg withholding taxes are levied on distributions made by Luxembourg RAIFs opting for both the SIF and the SICAR tax regimes.

*Financial participation companies and partnerships ("SOPARFI" and "SCS/SCSp")*

Luxembourg SOPARFIs, governed by the Amended Luxembourg Law of 10 August 1915 on Commercial Companies, are Luxembourg corporate entities and are subject to Luxembourg corporate income tax, municipal business tax, and net wealth tax. Luxembourg partnerships (SCS / SCSp) are not generally subject to Luxembourg corporate income tax, municipal business tax, and net wealth tax. However, under certain circumstances, a Luxembourg partnership may be subject to municipal business taxes.

Dividend distribution made by a SOPARFI may be subject to Luxembourg dividend withholding taxes at a rate of 15% unless exempted or reduced by virtue of the Luxembourg participation exemption regime or a double tax treaty.

No Luxembourg withholding taxes are levied on distributions made by Luxembourg SCS / SCSp's.

### ***Shareholders being Luxembourg Pension Funds***

#### *Pension-Saving Companies with Variable Capital ("SEPCAV")*

Luxembourg SEPCAVs, governed by the Amended Luxembourg Law of 13 July 2005 on Luxembourg pension funds, are in principle subject to Luxembourg corporate income tax and municipal business tax. However, income and capital gains derived from transferable securities are exempt from Luxembourg corporate income and municipal business taxes. Luxembourg SEPCAVs are exempt from net wealth tax.

#### *Pension-Saving Association ("ASSEP")*

Luxembourg ASSEPs, governed by the Amended Luxembourg Law of 13 July 2005 on Luxembourg pension funds, are in principle subject to Luxembourg corporate income tax and municipal business tax. Luxembourg ASSEPs must account for tax-deductible reserves to cover their commitments toward the beneficiaries (creditors). Luxembourg ASSEPs are exempt from net wealth tax.

### ***Shareholders being Luxembourg resident individuals***

Luxembourg resident individuals are subject to the Luxembourg Income Tax Law of 4 December 1967 as amended (*Loi modifiée du 4 décembre 1967 concernant l'impôt sur le revenu*). Notwithstanding applicable double tax treaties and other measures, Luxembourg resident individuals are subject to tax on their worldwide income in Luxembourg.

Distributions received by Luxembourg resident individual Shareholders of the Company are taxable in Luxembourg at progressive rates, with the marginal tax rate being 45.78%. A tax exemption is allowed on 50% of dividends and similar income from fully taxable capital stock companies that are resident in Luxembourg, in another EU Member State and covered by the EU Parent-Subsidiary Directive, or in a country having entered into a double tax treaty with Luxembourg, provided that the company is subject to a tax comparable to the Luxembourg corporate income tax. Aggregated movable income (dividends and interest not subject to final withholding tax) are tax-free up to EUR 1,500 per year (EUR 3,000 in case of married/registered partners being jointly taxable). Furthermore, dependence insurance contribution at a rate of 1.4% is due on the taxable amount.

Capital gains realized by Luxembourg resident individual Shareholders of the Company are exempt from Luxembourg income tax provided that they have been held for more than 6 months and do not represent substantial participation in the Company. Participation is considered substantial if the individual has held more than 10% of the company's share capital or equity at any time in the 5 years preceding the date of transfer of ownership. In case of a disposal within 6 months of acquisition (substantial or non-substantial), such capital gains are taxable at progressive tax rates marginal rates, with the marginal tax rate being 45.78%. Dependence insurance contribution at a rate of 1.4% is also due. However, if the disposal takes place after more than 6 months of the acquisition of the

participation and the participation qualifies as substantial, the gain is taxed at half of the average rate of the individual. Dependence insurance will also be due at a rate of 1.4%.

### ***Luxembourg Value Added Tax***

No VAT liability in principle arises in Luxembourg in respect of any payments by the Fund to its Unitholders to the extent such payments are linked to their subscription to the Fund's units/shares and thus do not constitute consideration received for any taxable services supplied. The sales and redemption of units/shares do not trigger any VAT liability either.

### **United Kingdom Taxation**

#### **The Company**

The Shares shall be widely available and shall be marketed and made available sufficiently widely to reach the intended categories of investors and in a manner appropriate to attract those investors.

Provided that the Company is not trading in the UK through a fixed place of business or agent situated therein that constitutes a "permanent establishment" for UK taxation purposes and that all the trading transactions in the UK of the Fund are carried out through a broker or investment manager acting as an agent of independent status in the ordinary course of its business, the Company will not be subject to UK corporation tax or the diverted profits tax on income or chargeable gains arising to it, other than certain UK source income. The Board of Directors intends that the affairs of the Company are conducted so that these requirements are met, insofar as this is within the Board's control. However, it cannot be guaranteed that the necessary conditions will at all times be satisfied.

The Company may be liable to transfer taxes on acquisitions of investments. Stamp Duty Reserve Tax ("SDRT") at a rate of 0.5% will be payable by the Company on the acquisition of stock, shares and certain loan capital issued by a company (a) incorporated in the UK, and (b) not incorporated in the UK that are (i) kept on a register that is maintain in the UK, or (ii) paired with UK securities. Stamp duty may arise at 0.5% (rounded up to the nearest £5) on acquisitions of stock or marketable securities, including certain loan capital, issued by (a) UK-incorporated company and (b) non-UK incorporated company where (i) the transfer relates to a matter or thing done or to be done in the UK or (ii) the transfer document is executed in the UK. Where stamp duty is paid, any SDRT which may have also arisen on the agreement to transfer is usually cancelled other than in the case of units in UK unit trusts.

#### **The Shareholder**

#### **The UK Offshore Funds Regime**

The Offshore Funds (Tax) Regulations 2009, as amended by the Offshore Funds (Tax) (Amendment) Regulations (the "Offshore Funds Regulations") introduced a regime for the taxation of investments in offshore funds (as defined in Part 8 of the Taxation (International and other Provisions) Act 2010 ("TIOPA")) which operates by reference to whether a fund opts into a reporting regime ("reporting funds") or not ("non-reporting funds"). In broad terms, a "reporting fund" is an offshore fund that meets certain upfront and annual reporting requirements to HMRC and its Shareholders.

If an individual Shareholder who is resident in the UK for taxation purposes holds an interest in an offshore fund and that offshore fund is a "non-reporting fund" for all periods of account for which the Shareholder holds that interest, any gain accruing to the Shareholder upon the sale, redemption or

other disposal of that interest (including a deemed disposal on death) will be taxed at the time of such sale, redemption or other disposal as income (an “offshore income gain”) and not as a capital gain.

Alternatively, where an individual Shareholder who is resident in the UK holds an interest in an offshore fund that has been a reporting fund for all periods of account for which they hold an interest, any gain accruing upon sale or other disposal (however not including deemed disposal on death) of their holding would be subject to tax as a capital gain rather than income, with relief for any accumulated or reinvested profits which have already been subject to UK income tax on income. Shareholders in non-reporting funds would be subject to tax on income distributed by a non-reporting fund, but not on income retained but not distributed by a non-reporting fund.

A disposal of an offshore reporting and non-reporting fund is generally considered non-UK situs for UK resident taxpayers. In the case of Shareholders who are individuals domiciled outside the UK, the gain may be subject to the remittance basis in particular circumstances.

The Board of Directors have been advised that the shareholdings in the Company will likely constitute interests in an offshore fund, as defined for the purposes of TIOPA, with each Class of Shares treated as a separate “offshore fund” for these purposes.

Certain Classes of Shares have already applied for and obtained “reporting status.” The reporting status obtained from HMRC for the relevant Classes of Shares will remain in place permanently so long as the annual requirements are undertaken. A list of the Classes of Shares which currently have reporting status is available at: <https://www.gov.uk/government/publications/offshore-funds-list-of-reporting-funds>

The Board of Directors intends to manage the affairs of the Company so that these upfront and ongoing duties are met and will continue to be met for the relevant Classes of Shares for each reporting period (as defined for United Kingdom tax purposes) on a per-Share basis to all relevant Shareholders (as defined for these purposes). UK Shareholders who hold their interests at the end of the reporting period to which the reported income relates, will be subject to income tax or corporation tax on the higher of any cash distribution paid and the full reported amount. The reported income will be deemed to arise to UK Shareholders six months after the year end. The reporting fund status obtained from HMRC for the relevant Classes of Shares will remain in place permanently provided the annual requirements are undertaken.

Investors should refer to their tax advisors in relation to the implications of the Company having obtained such status in respect of certain Classes of Shares.

### **Taxes on Income**

Subject to their personal circumstances, Shareholders who are resident in the UK for UK taxation purposes will be liable to UK corporation tax (in the case of companies) or income tax (in the case of individuals) annually in respect of dividends or other distributions of an income nature made by the Company, whether or not such dividends or distributions are reinvested. The nature of the charge to tax will depend upon the composition of the relevant assets of the Company.

For individual Shareholders in the UK, dividend distributions will be subject to income tax at the relevant marginal rate of tax for dividends, subject to any available allowances.

The Company will not withhold tax at source when paying a dividend.

Dividend distributions from an offshore fund made to corporate Shareholders resident in the UK are likely to fall within one of a number of exemptions from UK corporation tax. In addition, distributions to non-UK companies carrying on a trade in the UK through a permanent establishment in the UK should also fall within the exemption from UK corporation tax on dividends to the extent that the shares held by that company are used by, or held for, that permanent establishment.

Distributions from offshore funds are not generally considered UK source for UK resident taxpayers. In the case of Shareholders who are individuals domiciled outside the UK, distributions may be subject to the remittance basis in particular circumstances.

### **UK Corporation Tax – Loan Relationships**

Shareholders within the charge to UK corporation tax should note that the regime for the taxation of most corporate debt under the UK Corporation Tax Act 2009 (the “loan relationships regime”) provides that, if at any time in an accounting period, that person holds an interest in an offshore fund within the meaning of the relevant provisions of the Offshore Fund Regulations and TIOPA, and there is a time in that period when that fund fails to satisfy the “qualifying investments” test, the interest held by such a person will be treated for that accounting period as if it were rights under a creditor relationship for the purposes of the loan relationships regime. An offshore fund fails to satisfy the qualifying investments test at any time when more than 60% of its assets by market value (excluding cash awaiting investment) comprise “qualifying investments”. Qualifying investments include government and corporate debt securities, cash on deposit, certain derivative contracts and holdings in other collective investment schemes which at any time in the accounting period of the person holding the interest in the offshore fund do not themselves satisfy the qualifying investments test.

In the eventuality that the “qualifying investments test” is failed at any time during the life of a relevant Class of Shares, that Class will be treated for corporation tax purposes as within the loan relationships regime with the result that all returns on that Class of Shares in respect of such a corporate Shareholder’s accounting period (including gains, profits and losses) will be taxed or relieved as an income receipt or expense on a “fair value accounting” basis. Accordingly, in such eventuality, a corporate Shareholder who acquires Shares may, depending on its own circumstances, incur a charge to corporation tax on an unrealised increase in the value of its holding of Shares (and, likewise, obtain relief against corporation tax for an unrealised reduction in the value of its holding of Shares).

### **UK Income Tax – Distributions Treated as Interest**

Where an offshore fund invests more than 60% of its assets in interest-bearing (or economically similar) assets that are qualifying investments as defined above, distributions will not be treated as dividends but as interest in the hands of the individual Shareholder. This means that the relevant tax rates will be the marginal tax rates applying to interest, subject to any available allowances.

As above the remittance basis may be available to individuals domiciled outside the UK.

### **Other UK Tax Matters**

The attention of Shareholders subject to UK income tax is drawn to the anti-avoidance provisions of Section 714 of the Income Taxes Act 2007. These provisions deal with the transfer of assets outside the UK which may render certain resident persons liable to income tax in respect of undistributed income

profits of the Fund on an annual basis. The legislation is not directed towards the taxation of capital gains.

Corporate Shareholders resident in the UK for taxation purposes should note that “controlled foreign companies” legislation contained in Part 9A of TIOPA 2010 could apply to any UK resident company which is, either alone or together with persons connected or associated with it for taxation purposes, deemed to be interested in 25% or more of any chargeable profits of a non-UK resident company, where that non-UK resident company is controlled by residents of the UK and meets certain other criteria (broadly that it is resident in a low tax jurisdiction). “Control” is defined in Chapter 18, Part 9A of TIOPA 2010. A non-UK resident company is controlled by persons (whether companies, individuals or others) who are resident in the UK for taxation purposes or is controlled by two persons taken together, one of whom is resident in the UK for tax purposes and has at least 40% of the interests, rights and powers by which those persons control the non-UK resident company, and the other of whom has at least 40% and not more than 55% of such interests, rights and powers. The effect of these provisions could be to render such Shareholders liable to UK corporation tax in respect of the income of the Company.

The attention of Shareholders (including individuals, companies and trusts) resident in the UK for taxation purposes is drawn to the provisions of section 3 of the TCGA 1992 (“section 3”). Section 3 could be material to any such Shareholder who has an interest in the Company as a “participator” for UK taxation purposes (which term includes a shareholder) at a time when any gain accrues to the Fund (such as on a disposal of any of their investments) which constitutes a chargeable gain or an offshore income gain if, at the same time, the Company is itself controlled in such a manner and by a sufficiently small number of persons as to render the Company a body corporate that would, were it to have been resident in the UK for taxation purposes, be a “close” company for those purposes. The provisions of section 3 could, if applied, result in a Shareholder with such an interest in the Fund being treated for the purposes of UK taxation of chargeable gains as if a proportionate part of any capital gain or offshore income gain accruing to the Fund had accrued to that person directly; that part being equal to the proportion of the gain that corresponds to that Shareholder’s proportionate interest in the Fund. No liability under section 3 could be incurred by such a Shareholder, however, in respect of a chargeable gain or an offshore income gain accruing to the Fund if the aggregate proportion of that gain that could be attributed under section 3 both to that person and to any persons connected with him for UK taxation purposes does not exceed one quarter of the gain. In the case of Shareholders who are individuals domiciled outside the UK, section 3 applies subject to the remittance basis in particular circumstances.

### **Stamp Duties**

UK stamp duty reserve tax will not be payable on the transfer or redemption of the Shares provided that the register of Shareholders is kept outside the UK and the Shares are not paired (i.e., sold as a single unit) with UK shares. UK stamp duty will not be payable on the transfer or redemption of the Shares provided the relevant instrument of transfer is executed and retained outside of the UK and the relevant transfer does not relate to any matter or thing done or to be done in the UK. Further advice should be sought if this is expected to be the case. No UK stamp tax will be payable on the issue of any additional Shares.

### **Inheritance Tax**

An individual Shareholder domiciled or deemed for United Kingdom tax purposes domiciled in the United Kingdom may be liable to United Kingdom Inheritance Tax on a gift of their Shares in the event of death or on making certain categories of lifetime transfer. For these purposes, a transfer of Shares at less than their full market value may be treated as a gift.



## **United States Taxation**

Shareholders are hereby notified, in compliance with requirements imposed by the US Internal Revenue Service (the "IRS"), that the US tax advice contained herein (i) is written in connection with the promotion or marketing by the Company and the Investment Manager of the transaction or matters addressed herein, and (ii) is not intended or written to be used, and cannot be used by any taxpayer, for the purpose of avoiding US tax penalties. Each taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

The summary is based on Internal Revenue Code of 1986, as amended (the "Code"), applicable statutes and regulations, administrative pronouncements and judicial decisions as currently in effect. There can be no assurance (i) that changes in such authorities or their application or interpretation will not be made in the future, possibly with retroactive effect, or (ii) that the IRS will agree with the interpretation described below as applied to the operation of the Company.

### ***Taxation of the Company***

For US federal income tax purposes, the Company expects to be treated as a corporation. The remainder of this discussion assumes that the Company will be so treated.

There are specific exemptions from US federal income tax for non-US persons (including entities and individuals) who restrict their activities in the US to trading in stocks, securities and commodities (including currencies) for their own account. These exemptions may apply regardless of whether the non-US person or their employees conduct such trading through a broker, commission agent, custodian or other agent in the US. These particular exemptions do not apply to a non-US person that is engaged in business activities in the US, other than trading in stocks, securities and commodities (including currencies) for its own account, or if the person is considered a dealer in stocks or securities. The Company and Management Company intend to conduct the Company's affairs so that it will not be deemed to be engaged in a trade or business in the US and, therefore, none of its income (other than certain income from investments in US real property interests, if any) should be treated as "effectively connected" with a US trade or business carried on by the Company. However, in the event that the Company is deemed to be deriving income which is effectively connected with a US trade or business carried on by the Company, such income could be subject to US federal income tax at the graduated rates applicable to US persons, and the Company could also be subject to a branch profits tax on amounts deemed repatriated from the US based on a statutorily calculated dividend equivalent amount.

Certain categories of income (including dividend income and certain types of interest income) that are not effectively connected with a US trade or business but that are derived from US sources will be subject to US withholding taxes. It is anticipated that under current US tax law rules, substantially all of the US source interest income to be earned by any Fund will be exempt from US withholding tax. Provided certain documentation requirements are satisfied, the Company will not be subject to any US withholding tax on capital gains or proceeds arising from the sale or exchange of the Company's securities, commodities or other assets that are not effectively connected with a US trade or business of the Company (other than withholding on certain income and/or gains from investments in U.S. real property interest, if any).

### ***Taxation of Non-U.S. Shareholders***

The rules described in this section apply to any Shareholder of the Company who is a non-resident alien individual, a foreign corporation, a foreign partnership, or a foreign estate or trust (hereafter a “non-US investor”).

Non-US investors who are not engaged in a trade or business within the US and, if individuals, do not have a “tax home” in the US, generally will not be subject to any U.S. federal income, withholding, capital gains, estate or inheritance taxes with respect to the Shares owned by them or any dividends received by them on such Shares.

#### ***Foreign Account Tax Compliance Act Provisions (“FATCA”)***

The final regulations for the Foreign Account Tax Compliance Act that was enacted on 18 March 2010 by United States Congress as part of the Hiring Incentives to Restore Employment (“HIRE”) Act were issued on 17 January 2013. FATCA is generally effective for payments made after 30 June 2014. The FATCA provisions impose new tax documentation requirements on both a Fund and its Shareholders. If the tax documentation requirements are not satisfied, FATCA imposes a 30% withholding tax on certain payments (including dividends, interest and proceeds from the sale of securities) that may be received by a Fund or that may be made to a Shareholder on redemption of Shares in the Company.

In order to comply with FATCA, the Company may request additional tax-related documentation from its Shareholders. A Shareholder that fails to comply with such documentation requests may be charged with any taxes imposed on the Company attributable to such investor’s noncompliance under the FATCA Provisions. The Company may, in its sole discretion, redeem such Shareholder’s shares. While the Company will make reasonable efforts to seek documentation from Shareholders to comply with these rules and to allocate any taxes imposed or required to be deducted under FATCA to Shareholders whose noncompliance caused the imposition or deduction of the tax, it is possible that complying Shareholders in the Company may be affected by the presence of such non-complying Shareholders.

The Company may find itself subject to an Intergovernmental Agreement (“IGA”) that was entered into between the jurisdiction in which the Company is located and the U.S. Internal Revenue Service, that supersedes certain provisions under FATCA. If the Company is subject to an IGA, the Company will apply the appropriate documentation requirements under the terms of the IGA and will make reasonable efforts to assure that the Company complies with the terms of the applicable IGA.

PURSUANT TO US TREASURY DEPARTMENT CIRCULAR 230, THE COMPANY IS INFORMING THE PROSPECTIVE INVESTORS THAT (A) THE SUMMARY SET FORTH ABOVE IS NOT INTENDED AND WAS NOT WRITTEN TO BE USED, AND CANNOT BE USED, BY ANY TAXPAYER FOR THE PURPOSE OF AVOIDING PENALTIES UNDER THE US FEDERAL TAX LAWS THAT MAY BE IMPOSED ON THE TAXPAYER, (B) THE SUMMARY SET FORTH ABOVE WAS WRITTEN IN CONNECTION WITH THE PROMOTION OR MARKETING BY THE COMPANY AND THE DISTRIBUTOR OF THE SHARES, AND (C) EACH TAXPAYER SHOULD SEEK ADVICE BASED ON ITS PARTICULAR CIRCUMSTANCES FROM AN INDEPENDENT TAX ADVISOR.

#### **Danish Taxation**

##### ***Taxation in Denmark***

The below description of the Danish tax rules applies to investors that are fully liable to tax in Denmark. The description is not to be considered exhaustive which means that details and exceptions are not described. Accordingly, the following do not constitute legal or tax advice and Shareholders and potential investors are therefore advised to consult their professional advisers.

Furthermore, please note that the description reflects the current tax Danish tax rules in force at the date of this Document and that the tax rules can be subject to future amendments.

The Fund is organised as an investment company with variable capital under Irish law and governed by the UCITS Directive and is, thus, perceived as an investment company governed by section 19 and section 19 A-C of the Danish Capital Gains Tax Act which means that all types of Danish taxable investors are generally taxed in accordance with a mark-to-market principle.

Consequently, an investor is subject to an annual taxation of both realised and unrealised gains and losses in the relevant income year. Gains and losses are calculated as the annual increase or decrease in the value of the investor's Shares in the Fund from the beginning of the income year to the end of the income year. For Shares acquired by the investor during the income year, the purchase price will thus replace the value of the Shares at the beginning of the income year, and for shares sold by the investor during the income year, the sales price will replace the value of the Shares at the end of the income year.

Distributions from the Fund, if any, are taxable at the time the investor acquires a right to the distribution.

Please note that an exchange of Shares in one Fund of an investment fund with Shares in another Fund of the same investment fund is a taxable event equated with a sale and purchase of Shares. Also please note, since the Shares can generally be redeemed on a daily basis it is assumed in the following that the Shares are regarded as transferable investment certificates for Danish tax purposes which means that the Shares are treated as if they were traded on a regulated market for tax purposes, cf. section 3 of the Danish Capital Gains Tax Act.

Below, please find an overview of the taxation of individuals and companies.

### *Individual investors*

#### *Savings not covered by special schemes*

Gains, losses and dividends derived from Shares acquired for savings not covered by special tax schemes will normally be taxed as capital income at a rate of up to approx. 42% excluding church tax.

For the Wellington Global Impact Fund, an election has been made for equity-based investment company tax status under Danish tax rules, cf. section 19 B of the Danish Capital Gains Tax Act, from the calendar year 2020. The Board of Directors intends to manage the affairs of the Company so that the Fund fulfills the requirement for having this tax status for subsequent calendar years. Accordingly, gains and losses, and distributions, if any, on shares in the Fund will be taxed as equity income (*in Danish: aktieindkomst*) at a rate of up to 42%.

If the Shares are held on an account in a Danish bank, all relevant information will often be reported to the Danish tax authorities automatically and pre-printed on the annual tax return. However, investors must always check for themselves whether the information that the custodian bank has reported to the tax authorities is correct and make any corrections to the annual tax return as they are always responsible for filing a correct tax return.

#### *Savings in the Business Tax Scheme*

If self-employed individuals invest savings encompassed by the special business tax scheme (*in Danish "virksomhedsordningen"*) in the Fund then gains, losses and dividends, if any, will be subject to a provisional business tax at a rate of 22%.

#### *Savings on an Equity Savings Account*

Shares in the Wellington Global Impact Fund, with tax status as an equity-based investment company qualifies for being held at an Equity Savings Account (*In Danish "Aktiesparekonto"*) set-up in a bank.

For Shares held on such accounts, gains, losses and dividends, if any, are taxed at a rate of 17%. The tax is calculated and settled to the tax authorities by the account-holding bank, i.e., the tax is not calculated and settled in conjunction with the ordinary tax return procedure.

#### *Savings in pension saving accounts in banks*

If savings in pension savings accounts in banks are invested in Shares of the Fund (in compliance with the rules in the Danish legislation on pension savings, which aims to ensure that the savings are invested in a diversified portfolio), then these investments will be subject to a pension yield tax at a rate of 15.3%. The tax is calculated and settled to the tax authorities by the account-holding bank, i.e., the tax is not calculated and settled in conjunction with the ordinary tax return procedure.

#### *Corporate investors*

Gains, losses and dividends, if any, will be taxed as ordinary corporate income at a rate of 22%. Life insurance companies, pension funds, etc., are, however, also subject to taxation in certain situations as described in the Danish Act on Taxation of Pension Yield.

#### **Taxation of Investments Generally**

The Company invests on exchanges, and in securities issued by entities which are virtually all domiciled in countries other than Ireland. Many of these countries have laws that tax non-resident investors, such as the Company, on income or gains arising from that country. While many of these countries have withholding or other mechanisms that clarify the application and payment of tax, in certain countries there can be uncertainty about how tax law is applied to income earned by the Company and as a result, uncertainty as to the amount, if any, that will ultimately be payable by the Company. While the Company monitors the tax position from its investment activities, there remains a risk that any one, or several, foreign tax authorities will attempt to collect taxes on investment income earned by the Company, or under financial accounting standards, the Company may be required to accrue for such uncertain taxes. This could happen without any prior warning, possibly on a retrospective basis, and could result in a material loss to the Company's Net Asset Value per share.

The income and/or gains of the Company from the investments may suffer withholding tax in the countries where such income and/or gains arise. The Company may not be able to benefit from reduced rates of withholding tax in double taxation agreements between Ireland and such countries. The rate of withholding tax therefore, may vary from the rate applied to the benchmark against which Fund performance is measured where a net of tax benchmark is used. If this position changes in the future and the application of a lower rate results in repayment to the Fund(s), the Net Asset Value of the Fund(s) will not be restated and the benefit will be allocated to the existing Shareholders ratably at the time of repayment.

Generally, Shareholders must include in computing their income for tax purposes the amount of the net income, and the taxable portion of the net realised capital gains, paid or made payable to them in the year by the Company, even if such amount is reinvested in additional shares. Generally, Shareholders must report in their tax returns any capital gains realised on the disposition of shares which may include a switch among Funds, a switch between different funds and / or a liquidation of the Fund or the Company.

Shareholders should consult their own tax advisors concerning the deductibility of management fees paid directly to the Management Company.

The above statements are only intended as a general summary of the current position under current tax law and practice of Shareholders who are the absolute beneficial owners of Shares who hold such shares as an investment and their applicability will depend upon the particular circumstances of each Shareholder. In particular, these statements may not apply to certain Classes of Shareholder (such as financial institutions). The summary is not exhaustive and does not generally consider tax relief or exemptions.

Prospective Shareholders are advised to consult their own tax advisors on the tax implications for them of investing, holding and disposing of Shares and receiving distributions in respect of Shares.

## **GENERAL INFORMATION**

### **Data Protection**

In the course of business, the Company will collect, record, store, adapt, transfer and otherwise process personal data which may include investors' names, address, tax identification number(s), date and place of birth of the investors, account number or its functional equivalent (if the investor is a legal person, the same categories of personal data may be processed in relation to its contact person(s) and/or beneficial owner(s)), by which prospective investors may be directly or indirectly identified. The Company is a data controller within the meaning of the EU Data Protection Directive 95/46/EC and the EU Privacy & Electronic Communications Directive 2002/58/EC, any amendments and replacement legislation including the EU General Data Protection Regulation (EU) 2016/679, European Commission decisions, binding EU and national guidance and all national implementing legislation ("Data Protection Legislation") and will hold any personal data provided by or in respect of investors in accordance with Data Protection Legislation.

The Company and/or any of its delegates or service providers may process prospective investor's and investor's personal data for any one or more of the following purposes and legal bases:

1. to operate the Funds, including managing and administering a Shareholder's investment in the relevant Fund on an on-going basis which enables the Company to satisfy its contractual duties and obligations to the Shareholder and any processing necessary for the preparation of the contract with the Shareholder;
2. to comply with any applicable legal, tax or regulatory obligations on the Company, for example, under the Companies Act and anti-money laundering and counter-terrorism legislation and fraud prevention;
3. for any other legitimate business interests' of the Company or a third party to whom personal data is disclosed, where such interests are not overridden by the interests of the investor, including for statistical analysis, market research purposes and to perform financial and/or regulatory reporting; or

4. for any other specific purposes where investors have given their specific consent and where processing of personal data is based on consent, the investors will have the right to withdraw it at any time.

Personal data may also be transferred to other entities, such as the Administrator, Investment Manager, Transfer Agent or their delegates, acting as data processors. These data processors shall only act on documented instruction from the Company.

The Company and/or any of its delegates or service providers may disclose or transfer personal data, whether in Ireland or elsewhere (including entities situated in countries outside of the EEA), to other delegates, duly appointed agents and service providers of the Company (and any of their respective related, associated or affiliated companies or sub-delegates) and to third parties including advisers, regulatory bodies, tax authorities, auditors, technology providers for the purposes specified above.

The Company will not keep personal data for longer than is necessary for the purpose(s) for which it was collected. In determining appropriate retention periods, the Company shall have regard to the Statute of Limitations Act 1957, as amended and any statutory obligations to retain information, including anti-money laundering, counter-terrorism and tax legislation. The Company will take all reasonable steps to destroy or erase the data from its systems when they are no longer required.

Where specific processing is based on an investor's consent, that investor has the right to withdraw it at any time. Investors have the right to request access to their personal data kept by the Company; and the right to rectification or erasure of their data; to restrict or object to processing of their data, and to data portability, subject to any restrictions imposed by Data Protection Legislation and any statutory obligations to retain such information.

The Company and/or any of its delegates and service providers will not transfer personal data to a country outside of the EEA unless that country ensures an adequate level of data protection or appropriate safeguards are in place. The European Commission has prepared a list of countries that are deemed to provide an adequate level of data protection which may be updated by the European Commission from time to time. If a third country does not provide an adequate level of data protection, then the Company and/or any of its delegates and service providers will ensure it puts in place appropriate safeguards such as the model clauses (which are standardised contractual clauses, approved by the European Commission).

Where processing is carried out on behalf of the Company, the Company shall engage a data processor, within the meaning of Data Protection Legislation, which implements appropriate technical and organisational security measures in a manner that such processing meets the requirements of Data Protection Legislation, and ensures the protection of the rights of investors. The Company will enter into a written contract with the data processor which will set out the data processor's specific mandatory obligations laid down in Data Protection Legislation, including to process personal data only in accordance with the documented instructions from Company.

As part of the Company's business and ongoing monitoring, the Company may from time to time carry out automated decision-making in relation to investors, including, for example, profiling of investors in the context of anti-money laundering reviews, and this may result in an investor being identified to the tax authorities, law enforcement authorities and to other entities where required by law, and Company terminating its relationship with the investor.

Investors are required to provide their personal data for statutory and contractual purposes. Failure to provide the required personal data will result in the Company being unable to permit, process, or

release the investor's investment in the Funds and this may result in the Company terminating its relationship with the investor. Investors have a right to lodge a complaint with the Office of the Data Protection Commissioner if they are unhappy with how the Company is handling their data.

Any questions about the operation of the Company's data protection policy should be referred to the Company at its registered address.

### **Fund Transactions and Conflicts of Interest**

Subject to the provisions of this section, the Management Company, the Investment Manager, the Administrator, the Transfer Agent, the Depositary, the Distributor, any Shareholder, and any of their respective subsidiaries, affiliates, associates, agents or delegates (each a "Connected Person"), may contract or enter into any financial, banking or other transaction with one another or with the Company, including without limitation, investment by the Company in securities of a Shareholder, or investment by any Connected Persons in any company or body any of whose investments form part of the assets comprised in any Fund or be interested in any such contract or transactions.

In addition, any cash of the Company may be deposited, subject to the provisions of the Central Bank Acts, 1942 to 2015, with any Connected Person or invested in certificates of deposit or banking instruments issued by any Connected Person. Banking and similar transactions may also be undertaken with or through a Connected Person.

Any Connected Person may also deal as agent or principal in the sale or purchase of securities and other investments to or from the Company or through the Depositary or any subsidiary, affiliate, associate, agent or delegate thereof. There will be no obligation on the part of any such Connected Person to account to Shareholders for any benefits so arising, and any such benefits may be retained by the relevant party, provided that such transactions are carried out as if effected on normal commercial terms negotiated at arm's length, are consistent with the best interests of Shareholders, and

- (a) a certified valuation of such transaction by a person approved by the Depositary as independent and competent has been obtained; or
- (b) such transaction has been executed on best terms reasonably available on an organised investment exchange under its rules; or

where neither (a) nor (b) are practicable,

- (c) such transaction has been executed on terms which the Depositary is satisfied conform with the principle that such transactions be carried out as if effected on normal commercial terms negotiated at arm's length.

Prospective investors and Shareholders should be aware that the Investment Manager and its affiliates may manage multiple accounts for clients that are also invested in Funds. These accounts often encompass a variety of different investment objectives and strategies. Entities within the Wellington Management Group and personnel of the Investment Manager and its affiliates may also invest their own assets in, or provide seed capital to the Funds. In relation to those investments, certain terms of investing in a Fund (e.g., the Minimum Initial Subscription for a Class of Shares) may be waived and such investments may have different fee arrangements whereby fees are waived, reduced or otherwise not charged including where, for example, the client's account is charged fees outside the relevant Fund based on the aggregate assets and/or performance of that account, including its investment in the Fund. In addition, Wellington Management, the Investment Manager, or their personnel may have access to

information about a Fund that is not available to other Shareholders in the Funds, or may have access to information on a more timely basis than other Shareholders. In relation to Wellington Management's seed capital investment in a Fund, Wellington Management may utilise a variety of techniques to hedge investment risks, including strategies designed to hedge Wellington Management's exposure to a specific issuer, instrument or asset held in a Fund. As a result, a Fund's exposure to a specific issuer, instrument or asset may be greater than Wellington Management's exposure. When providing seed capital to any of the Funds, either subscribing for such Shares where there are net redemptions or redeeming such Shares where there are net subscriptions in a Fund, Wellington Management may benefit to the extent the net subscriptions or redemptions for Shares in the Fund on that Dealing Day trigger a swing pricing adjustment as further described in this Prospectus.

The Funds may be subject to restrictions or limitations in their trading or investment under the Investment Manager's policies and procedures designed to comply with applicable law and its obligations to their clients however always in conformity to the investment restrictions of the Umbrella Fund.

The Investment Manager may also, in the course of its business, have potential conflicts of interest with the Company and/or Management Company in circumstances other than those referred to above. The Investment Manager will, however, have regard in such events to its obligations under the Investment Management Services Agreement and, in particular, to its obligations to act in the best interests of the Company, the Management Company and the Shareholders so far as practicable, having regard to its obligations to other clients when undertaking any investments where conflicts of interest may arise. In the event that a conflict of interest does arise the Directors will endeavour to ensure that such conflicts are resolved fairly, investment opportunities are allocated fairly and any material information relating to a Fund is disclosed in a fair and equitable manner to all investors.

The Directors may act as directors of other collective investment vehicles.

### **Payments to Financial Intermediaries and Potential Conflicts of Interest**

Prospective investors and Shareholders should also be aware that the Investment Manager and/or the Distributor or one or more of their affiliates, may make, out of their own resources, additional cash payments to financial intermediaries in support of certain marketing and administrative activities. In respect of marketing activities this may include payments for or reimbursement of the costs associated with sales and marketing events, such as conferences, seminars, sales or training programs for employees or clients or other intermediary-sponsored events. In respect of administrative activities such payments might relate to platforms, account maintenance or transaction processing. Such payments will only be made to the extent they are not prohibited by applicable laws or internal policies. Depending on the arrangements in place at any particular time, a financial intermediary may have a financial incentive to recommend a particular Fund or Share Class. You may ask your financial intermediary for information about any payments it receives from the Wellington Management group and any services provided, as well as about any fees and/or commissions it charges in addition to those disclosed in this Prospectus.

### **Depository's Potential Conflicts of Interest**

The Depository is part of an international group of companies and businesses that, in the ordinary course of their business, act simultaneously for a large number of clients, as well as for their own account, which may result in actual or potential conflicts. Conflicts of interest arise where the Depository or its affiliates engage in activities under the depository agreement or under separate contractual or other arrangements. Such activities may include:



- (i) providing nominee, administration, registrar and transfer agency, research, agent securities lending, investment management, financial advice and/or other advisory services to the Company;
- (ii) engaging in banking, sales and trading transactions including foreign exchange, derivative, principal lending, broking, market making or other financial transactions with the Company either as principal and in the interests of itself, or for other clients.

In connection with the above activities the Depositary or its affiliates:

- (i) will seek to profit from such activities and are entitled to receive and retain any profits or compensation in any form and are not bound to disclose to, the Company and/or Management Company, the nature or amount of any such profits or compensation including any fee, charge, commission, revenue share, spread, mark-up, mark-down, interest, rebate, discount, or other benefit received in connection with any such activities;
- (ii) may buy, sell, issue, deal with or hold, securities or other financial products or instruments as principal acting in its own interests, the interests of its affiliates or for its other clients;
- (iii) may trade in the same or opposite direction to the transactions undertaken, including based upon information in its possession that is not available to the Company;
- (iv) may provide the same or similar services to other clients including competitors of the Company;
- (v) may be granted creditors' rights by the Fund which it may exercise.

The Management Company or Company may use an affiliate of the Depositary to execute foreign exchange, spot or swap transactions for the account of the Management Company or Company. In such instances the affiliate shall be acting in a principal capacity and not as a broker, agent or fiduciary of the Management Company or Company. The affiliate will seek to profit from these transactions and is entitled to retain and not disclose any profit to the Management Company or Company. The affiliate shall enter into such transactions on the terms and conditions agreed with the Management Company or Company.

Where cash belonging to the Management Company or Company is deposited with an affiliate being a bank, a potential conflict arises in relation to the interest (if any) which the affiliate may pay or charge to such account and the fees or other benefits which it may derive from holding such cash as banker and not as trustee.

The Management Company and Company may also be a client or counterparty of the Depositary or its affiliates.

Up-to-date information on the Depositary, its duties, any conflicts that may arise, the safe-keeping functions delegated by the Depositary, the list of delegates and sub-delegates and any conflicts of interest that may arise from such a delegation will be made available to Shareholders on request.

#### **Directors' Interests**

There are no service contracts in existence between the Company and any of its Directors, nor are any such contracts proposed.

At the date of this Prospectus, no Director has any interest, direct or indirect, in any assets which have been or are proposed to be acquired or disposed of by, or issued to, the Company and no Director is materially interested in any contract or arrangement subsisting at the date hereof which is unusual in its nature and conditions or significant in relation to the business of the Company.

At the date of this Prospectus neither the Directors nor any Associated Person have any beneficial interest in the share capital of the Company or any options in respect of such capital.

The Directors of the Company, with the exception of Messrs. Brody, Manahan and Brady are partners or employees of entities within the Wellington Management group. Their biographical details are set out above.

## **Share Capital**

At the date hereof the authorised share capital of the Company is 30,000 subscriber shares of Euro 1.27 each and 500,000,000,000 shares of no par value initially designated as unclassified shares.

## **Reserves & Distribution Policies**

### *Reserves Policy*

Under the Articles, the Directors may before declaring any distributions set aside out of the profits of the Company and carry to the credit of any reserve account such sums as they think proper, which shall, at the discretion of the Directors, be applicable for any purpose to which the profits or reserves may be properly applied and pending such application may at the like discretion either be employed in the business of the Company or be invested in such investments as the Directors may from time to time think fit. The Directors may also carry forward to the accounts of the succeeding year or years any balance of profits which they shall think fit neither to divide nor to place to reserve.

### *Distribution Policy*

No distribution shall be payable to the holders of the subscriber shares.

The Directors in each year may if they think fit declare such distributions on the Shares, or on any Class of Shares as appear to the Directors to be justified by the profits being:

- all revenue received or accrued including interest and distributions less all actual and accrued expenses of the relevant Fund attributable to the respective Share Class; and/or
- realised profits on the disposal of investments less realised losses on the disposal of investments of the relevant Fund attributable to the respective Share Class and unrealised profits less unrealised losses on the valuation of investments of the relevant Fund attributable to the respective Share Class; and/or
- realised and unrealised gains less realised and unrealised losses of the relevant Fund attributable to the respective Share Class.

PROVIDED THAT in each case that distributions may only be paid out of funds available for the purpose which may be lawfully distributed.

The Directors at such times as they think fit may also declare such distributions on any Share Class out of the capital of the relevant Fund.

On the occasion of the payment of a distribution to the holder of a Share in respect of which an income equalisation payment (as described in the paragraph entitled **Income Equalisation** below) has been paid and to whom a capital sum is payable in accordance with the Articles the amount of the distribution payable to such holder shall be reduced by the amount of the capital sum payable to such holder as aforesaid and if such capital sum is equal to or greater than the distribution which would otherwise be payable no distribution shall be payable on such Share.

The Directors may in accordance with the provisions laid down in the Articles declare interim distributions on Shares of any Share Class.

The Directors may deduct from any distribution or other monies payable to any Shareholder on or in respect of a Share all sums of money (if any) presently payable by him to the Company in relation to the shares of the Company.

Where the Company is required to pay any taxation to the Irish tax authorities as a consequence of making any payment to a Shareholder, the Directors may deduct from the payment an amount equal to the taxation attributable to the relevant payment(s) and pay such amount to the Irish taxation authorities.

All unclaimed distributions on Shares may be invested or otherwise made use of by the Directors for the benefit of the relevant Fund and its respective Share Classes until claimed. No distribution shall bear interest against the Company. The payment by the Directors of any unclaimed distribution or other monies payable on or in respect of a Share into a separate account shall not constitute the Company a trustee in respect thereof and any distribution unclaimed after a period of six years from the date of declaration of such distribution shall be forfeited and shall revert to the relevant Fund and its respective Share Classes.

Where it is not the intention of the Directors to declare a distribution, any distributable profits will remain in the relevant Fund's assets and be reflected in the Net Asset Value of the relevant Class of Shares.

Where it is the intention of the Directors to declare a distribution, it shall ordinarily be declared in accordance with the distribution policy of the relevant Fund and its respective Share Classes.

Shares of any Share Class may at the discretion of the Directors be issued on the basis that any distributions declared in respect of those Shares will be automatically reinvested on behalf of the relevant Shareholder in the subscription of further Shares of that Share Class. Further Shares will be issued on the date the distribution is declared or, if that is not a Dealing Day, on the next following Dealing Day at a price calculated in the same way as for other issues of Shares on that Dealing Day. There is, however, no minimum number of such further Shares which may be so subscribed and fractions of Shares will be issued if necessary.

**At the present time it is the intention of the Directors to declare distributions on Distributing Shares only based on the procedures below.**

The Directors reserve the right to amend the calculation methodology of a distribution of a Fund or its respective Share Classes, notwithstanding the distributions will be calculated in accordance with the provisions relating to distributions in the Articles.

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same Class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

Shareholders of Accumulating Share Classes who wish to receive their share of the earnings of a Fund must request a redemption of Shares, in accordance with the terms governing redemption of Shares.

### **Frequency of distribution payments**

A Fund may offer Distributing Share Classes with the distribution payment frequencies listed below, as stated in the relevant Supplement:

- **M – Monthly**

Declared on or about the last Business Day of the month and paid within seven Business Days following the end of the relevant month.

- **Q – Quarterly**

Declared on or about the last Business Day of the calendar quarter and paid within seven Business Days following the end of the relevant quarter.

- **A – Annually**

Declared on or about the last Business Day of the financial year and paid within seven Business Days following the end of the financial year.

The Board of Directors may decide to declare and pay distributions with a frequency and timing other than as described above, including offering additional frequency Distribution Share Classes and the details will be set out in the relevant Supplement.

### **Distribution Types**

A Fund may offer Distributing Share Classes of the types listed below as stated in the relevant Supplement:

#### **1. Net Distribution**

Where it is the intention of the Directors to declare a distribution for the “Net Distribution” type of Distributing Shares, it shall ordinarily be declared from net investment income, represented by the distributions and interest received by the relevant Fund, after charging expenses and various other items as set out in the Charges and Expenses section above, attributable to the relevant Shares, unless otherwise stated in the relevant Supplement. Where a Share Class charges a performance fee this fee will not ordinarily be included as part of the accrued expenses for the purpose of calculating the distribution. The Board of Directors may offer this distribution type of Distributing Share for any Fund.

#### **2. Gross Distribution**

Where it is the intention of the Directors to declare a distribution for the “Gross Distribution” distribution type of Distributing Share, it shall ordinarily be declared from gross investment income, represented by the distributions and interest received by the relevant Fund, before charging expenses

and various other items as set out in the Charges and Expenses section above, attributable to the relevant Shares, unless otherwise stated in the relevant Supplement.

As expenses and various other items, as set out under the **Charges and Expenses** section are applied against capital, instead of against income, the potential for capital growth may be reduced and capital may be eroded in the long term. The Directors typically offer this distribution type of Distributing Share for Funds that are expected to provide a meaningful natural yield (as determined by the Directors) over a market cycle.

### **3. Fixed Distribution**

Where it is the intention of the Directors to declare a distribution for the “Fixed Distribution” type of Distributing Share, it shall ordinarily be declared from gross investment income represented by the dividends and interest received by the relevant Fund as an amount per Share, in the currency of the relevant Share Class, based on the projected gross income yield.

Distributions are declared before charging expenses and various other items as set out under the **Charges and Expenses** section, attributable to the relevant Shares, unless otherwise stated in the relevant Supplement.

For hedged Distributing Share Classes of this type, the amount payable will also reflect the addition or deduction of the interest rate differential. Depending on the currency hedging transactions within Hedged Share Classes for a Fund, this differential will be the percentage difference between the interest rate of the Dealing Currency of the Hedged Share Class and either:

- (i) the interest rate of the Base Currency of the relevant Fund or
- (ii) the interest rate of currencies (based on benchmark weights) in which the assets of the relevant Fund may be denominated. For more detail on the currency hedging transactions within Hedged Share Classes for a Fund, please see the relevant Supplement. The interest rate differential used to calculate the distribution for each period may not necessarily equal the actual interest rate differential resulting from any currency hedging transactions carried out by the Fund.

At the Board of Directors’ discretion, the long term aim is for distributions to be declared below or equal to gross investment income (in the respective base currency as stated in the relevant Supplement). However, where there is insufficient gross income in a given month, distributions may be paid out of capital if realized and unrealized net gains and losses are also insufficient. The Board of Directors at such times as they deem appropriate may also declare such distributions on any Share Class out of the capital of the relevant Fund.

In order to deliver a managed level of income, and as expenses and various other items as set out under the Charges and Expenses section are applied against capital, instead of against income, the potential for capital growth may be reduced and capital may be eroded in the long term.

The Directors at such times as they deem appropriate may also declare such distributions out of the capital of the relevant Fund. The Directors typically offer this distribution type of Distributing Share for Funds that do not have an income objective but are expected to provide a meaningful natural yield (as determined by the Directors) over a market cycle.

### **4. Managed Distribution**

Where it is the intention of the Directors to declare a distribution for the “Managed Distribution” type of Distributing Share, it shall ordinarily be declared from gross investment income represented by the dividends and interest received by the relevant Fund, before charging expenses and various other items

as set out under the **Charges and Expenses** section, attributable to the relevant Shares, unless otherwise stated in the relevant Supplement as either:

- (i) an amount per Share, in the currency of the relevant Share Class, based on a projected gross income yield or
- (ii) a percentage of relevant Share Class net assets, based on a projected gross income yield.

The applicable method will be outlined in the relevant Fund Supplement.

For hedged Distributing Share Classes of this type, the amount payable will also reflect the addition or deduction of the interest rate differential. Depending on the currency hedging transactions within the Hedged Share Classes for a Fund, this differential will be the percentage difference between the interest rate of the Dealing Currency of the Hedged Share Class and either:

- (i) the interest rate of the Base Currency of the relevant Fund or
- (ii) the interest rate of currencies (based on benchmark weights) in which the assets of the relevant Fund may be denominated. For more detail on the currency hedging transactions within the Hedged Share Classes for a Fund please see the relevant Supplement. The interest rate differential used to calculate the distribution for each period may not necessarily equal the actual interest rate differential resulting from any currency hedging transactions carried out by the Fund.

At the Board of Directors' discretion, the long term aim is for distributions to be declared below or equal to gross investment income (in the respective base currency as stated in the relevant Supplement). However, where there is insufficient gross income in a given month, distributions may be paid out of capital if realized and unrealized net gains and losses are also insufficient. The Board of Directors at such times as they deem appropriate may also declare such distributions on any Share Class out of the capital of the relevant Fund.

In order to deliver a managed level of income, and as expenses and various other items as set out under the **Charges and Expenses** section are applied against capital, instead of against income, the potential for capital growth may be reduced and capital may be eroded in the long term.

The Directors intend to offer this distribution type of Distributing Share only for Funds that have an income objective.

No distribution may be made as a result of which the total net assets of the Company would become less than the equivalent of € 1,250,000.

The Directors may determine on behalf of the Funds to use an accounting technique known as income equalisation to prevent current Shareholders' earnings being impacted by subscriptions, conversions or redemption of Shares.

### **Memorandum and Articles of Association**

All holders of Shares will be entitled to the benefit of, will be bound by and deemed to have notice of the provisions of the Memorandum and Articles of Association of the Company summarised below, copies of which are available as detailed under **Documents for Inspection**.

The Articles contain provisions to the following effect:

- (i) **Voting Rights.** The Articles provide that on a show of hands at a general meeting of the Company every holder of Shares present in person or by proxy shall have one vote and the holder or holders of the subscriber shares shall only have one vote in respect of all the subscriber

shares; on a poll at a general meeting every holder of Shares who is present in person or by proxy shall have one vote in respect of each whole Share held by him and every holder of subscriber shares shall have one vote in respect of his holding of such shares.

The Articles further provide that, on a poll of all of the holders of Shares of more than one Class for the time being, the voting rights of holders shall be adjusted in a manner determined by the Directors so as to reflect the latest calculated redemption price per Share of each of the Classes in question.

- (ii) Compulsory redemption. The Directors have power to impose such restrictions as they think necessary for the purpose of ensuring that no Shares are acquired or held directly or beneficially by certain categories of investors as described in the Articles. They may also request the redemption of certain Shares for the reasons described in the Articles.
- (iii) Winding up. The Articles contain provisions to the following effect:
  - (a) If the Company shall be wound up a liquidator shall, subject to the provisions of the Companies Act 2014, be appointed and shall apply the assets of each Fund in satisfaction of creditors' claims relating to that Fund.

The assets available for distribution among the members shall then be applied in the following priority:

- (a) First, in the payment to the holder of the Shares of each Fund of a sum in the currency in which that Fund or the relevant Classes of Shares is designated or in any other currency selected by the liquidator as nearly as possible equal (at a rate of exchange determined by the liquidator) to the Net Asset Value of the Shares of such Class held by such holders respectively as at the date of commencement to wind up provided that there are sufficient assets available in the relevant Fund to enable such payment to be made. In the event that, as regards any Classes of Shares, there are insufficient assets available in the relevant Fund to enable such payment to be made recourse shall be had:
  - (1) First, to the assets of the Company not comprised within any of the Funds; and
  - (2) Secondly, to the assets remaining in the Funds for the other Classes of Shares (after payment to the holders of the Shares of the Classes to which they relate of the amounts to which they are respectively entitled under this paragraph (2)) pro rata to the total value of such assets remaining within each such Fund.
- (b) Secondly, in the payment to the holders of the subscriber shares of sums up to the nominal amount paid thereon out of the assets of the Company not comprised within any Funds remaining after any recourse thereto under sub paragraph (a) above. In the event that there are insufficient assets as aforesaid to enable such payment in full to be made, no recourse shall be had to the assets comprised within any of the Funds.
- (c) Thirdly, in the payment to the holders of each Classes of Shares of any balance then remaining in the relevant Fund, such payment being made in proportion to the number of Shares held.

- (d) Fourthly, in the payment to the holders of the Shares of any balance then remaining and not comprised within any of the Funds, such payment being made in proportion to the number of Shares held.

If the Company shall be wound up (whether the liquidation is voluntary, under supervision or by the court) the liquidator may, with the authority of a special resolution of the holders of Shares in the relevant Fund and any other sanction required by the Companies Act 2014, divide among the holders of Shares of any Class or Classes within a Fund in specie the whole or any part of the assets of the Fund, and whether or not the assets shall consist of property of a single kind, and may for such purposes set such value as he deems fair upon any one or more Class or Classes of property, and may determine how such division shall be carried out as between the holders or different Classes of holders. The liquidator may, with the like authority, vest any part of the assets in trustees upon such trusts for the benefit of members as the liquidator, with the like authority, shall think fit, and the liquidation of the Company may be closed and the Company dissolved, but so that no member shall be compelled to accept any assets in respect of which there is liability.

### **Income Equalisation**

The Directors may determine that the Company, on behalf of one of more of the Funds, use an accounting technique known as income equalisation to prevent distortion of current shareholders' earnings. This is accomplished by applying a portion of the proceeds from shares issued and redeemed, equivalent on a per Share basis to the amount of undistributed net investment income on the date of the transaction. Apportioned amounts are credited or charged to undistributed income. As a result distributions of the Share Class will be protected from the potential distortions caused by issues or redemptions of Shares.

Special rules may apply when a Fund operates income equalisation and investors should seek their own professional advice as to the tax consequences of investing in Shares of the Company.

### **Reports and Accounts**

The Company's year-end is December 31 in each year and the Company's annual report and audited account will be published within 4 months of each 31 December. The annual report and audited accounts of the Company will be available to Shareholders at the registered office of the Management Company within four months after the conclusion of each accounting year and at least twenty one days before the general meeting of the Company at which they are to be submitted for approval. The Company will also make available in a similar manner the semi-annual report and unaudited accounts to Shareholders within 2 months after the end of each semi-annual period. The semi-annual report of the Company will be published within 2 months of each June 30.

Copies of the then latest audited report and annual accounts of the Company, and any subsequent semi-annual report and unaudited accounts of the Company, will also be sent free of charge to any Shareholder on request and are available on request to potential investors free of charge before the conclusion of any contract and can also be found online at [wellingtonfunds.com](http://wellingtonfunds.com).

Such reports and accounts will contain a statement of the Net Asset Value of each Fund and of the investments comprised therein as at the year-end or the end of such semi-annual period.

### **Material Contracts**

The following contracts have been entered into otherwise than in the ordinary course of the business intended to be carried on by the Company and are or may be material:



- (a) the Management Agreement between the Company and the Management Company as may be amended and/or supplemented from time to time. Under the terms of the Management Agreement, the Management Company is appointed to carry out the management, distribution and administration services in respect of the Company. The Management Company has the discretion to delegate all the powers, duties and discretions exercisable in respect of its obligations under the Management Agreement as the Management Company and any delegate may from time to time agree and with prior approval of, or notification to, the competent supervisory authority. The Management Agreement provides that the appointment of the Management Company will continue in force unless and until terminated by either party on three months prior written notice or otherwise in accordance with the terms of the Management Agreement. The Management Agreement contains provisions regarding the Management Company's legal responsibilities. The Management Company is not liable for any loss suffered by the Company in connection with the subject matter of the Management Agreement in the absence of negligence or wilful misconduct on its part in the course of the discharge of its duties and is indemnified by the Company in certain circumstances.
- (b) Investment Management Services Agreement between the Management Company and the Investment Manager listed in the section above entitled **Management and Administration** regarding the Funds, as may be amended and/or supplemented from time to time. The Agreement provide that the appointment of the Investment Manager will continue in force unless and until terminated by either party giving to the other not less than sixty days prior written notice. The Agreement oblige the Investment Manager at all times to exercise reasonable care and diligence and act in good faith in the performance of its duties and provides that the Investment Manager shall not be responsible and shall be without liability for any loss, liability, claim or expense suffered or incurred by the relevant Fund or the Management Company unless caused by the Investment Manager's own fraud, wilful default, negligence or wilful misconduct or that of its agents and employees.
- (c) the Amended and Restated Depositary Agreement between the Company, the Management Company and the Depositary as may be amended and/or supplemented from time to time. The Depositary and the Company have agreed an initial term as detailed in the Depositary Agreement. The Depositary or the Company may terminate the appointment during or after the set term for material breach of the agreement. The Company may terminate the Depositary Agreement during or after the set term by giving sixty (60) days prior written notice to the Management Company and the Depositary if the Depositary assigns the Depositary Agreement without consent. The Company may also terminate the Depositary Agreement if the Company or the Management Company determines persistent failures in service level standards. Following the set term, the Company may terminate the appointment at any time upon one hundred and eighty (180) days prior written notice. Neither the Company nor the Management Company may terminate the appointment of the Depositary and the Depositary may not retire from such appointment unless and until a successor depositary approved by the Central Bank has been appointed with the prior approval of the Central Bank or where the Depositary is no longer permitted to act as a depositary by the Central Bank. The Depositary shall be liable to the Company and the Shareholders, for all losses suffered by them as a result the Depositary's negligent or intentional failure to properly fulfil its obligations as set out in the Depositary Agreement and the UCITS Directive. The Depositary shall be liable to the Company or the Management Company acting on behalf of the UCITS for the loss by the Depositary or a duly appointed third party of any financial instruments held in custody (determined in accordance with the UCITS Directive) and shall be responsible for the return of financial instruments or corresponding amount to the Fund without undue delay. The Depositary Agreement contains

provisions governing the responsibility and limitations on the responsibility of the Depository and provides for its indemnification in certain circumstances.

- (d) Amended and Restated Administration Agreement as may be amended and/or supplemented from time to time between the Company, the Management Company and the Administrator. The Administrator and the Management Company have agreed an initial term as detailed in the Administration Agreement. The Administrator or the Management Company may terminate the appointment during or after the set term for material breach of the agreement, as required by law or for persistent failures in service level standards. Following the set term, the Administrator or the Management Company may terminate the appointment at any time upon one hundred and eighty (180) days prior written notice. In the absence of failure to exercise reasonable care and diligence, negligence, fraud or wilful misconduct the Administrator will not be liable for any loss arising as a result of the performance by the Administrator of its obligations and duties under the Administration Agreement. The Administration Agreement contains indemnities in favour of the Administrator except for losses arising out of the fraud, negligence, wilful misconduct or failure to exercise reasonable care or diligence or failure to act in good faith in the performance or non-performance of its duties under the Administration Agreement.
- (e) the Amended and Restated Registrar and Transfer Agency Agreement between the Management Company, the Company and the Transfer Agent as may be amended and/or supplemented from time to time. The Transfer Agent and the Management Company have agreed an initial term as detailed in the Registrar and Transfer Agency Agreement. The Transfer Agent or the Management Company may terminate the appointment during or after the initial term for material breach of the agreement, as required by law or for persistent failures in service level standards. Following the initial term, either the Transfer Agent or the Management Company may terminate the appointment at any time upon one hundred and eighty (180) days prior written notice. In the absence of failure to exercise reasonable care and diligence, negligence, fraud or wilful misconduct the Transfer Agent will not be liable for any loss arising as a result of the performance by the Transfer Agent of its obligations and duties under the Registrar Transfer Agency Agreement. The Registrar and Transfer Agency Agreement contains indemnities in favour of the Transfer Agent excluding matters arising by reasons of the Transfer Agent's fraud, wilful misconduct or failure to exercise reasonable care or diligence in the performance of duties and obligations under the Registrar and Transfer Agency Agreement.
- (f) the Distribution Agreement between the Management Company and the Distributor as may be amended and/or supplemented from time to time. As detailed in the Distribution Agreement, the appointment of the Distributor shall continue indefinitely and may be terminated by either party on not more than sixty days' or not less than fifteen days' written notice. Under the terms of the Distribution Agreement, the Distributor also may enter in dealer or sub-distributor arrangements with intermediaries who purchase or distribute the Shares. The Distributor will indemnify and hold harmless the Management Company and each of its employees, officers and directors and any delegate, the Company and each Fund against any and all claims, demands, actions, losses, damages, liabilities, indemnities, costs, charges, reasonable counsel fees, and expenses of any nature it or they incur caused by, relating to or arising out of or from the circumstances set out in the Distribution Agreement. The Distributor is indemnified by the Management Company in certain circumstances.

### **Strategy for the Exercise of Voting Rights**

The Management Company has a strategy for determining when and how voting rights attached to ownership of each Fund's investments are to be exercised for the exclusive benefit of the Fund. A

summary of this strategy as well as the details of the actions taken on the basis of this strategy in relation to each Fund may be obtained free of charge during normal office hours at the registered office of the Company.

### **Remuneration Policy**

The Management Company has established and applies a remuneration policy (the "Remuneration Policy"). The Remuneration Policy is consistent with and promotes sound and effective risk management. It is designed to discourage risk-taking which is inconsistent with the risk profile of the Management Company, the Company and the Funds. The Remuneration Policy applies to staff whose professional activities have a material impact on the risk profile of the Management Company, the Company or the Funds, and ensures that no individual will be involved in determining or approving their own remuneration. The Remuneration Policy will be reviewed at least annually.

Details of the up-to-date remuneration policy are available from [www.wellingtonfunds.com](http://www.wellingtonfunds.com) and a paper copy of the remuneration policy will be made available to Shareholders free of charge upon request.

### **Complaints Handling**

The details of the Company's complaint handling procedures may be obtained free of charge on request from the registered office of the Company.

### **Documents for Inspection**

Copies of the Memorandum and Articles of Association of the Company, Prospectus, Key Investor Documents and, after publication thereof, the periodic reports and accounts may be obtained free of charge on request from the registered office of the Company or the Investment Manager. Copies of the Memorandum and Articles of Association of the Company, the Key Investor Documents, Prospectus, and after publication thereof, the periodic reports and accounts, are also available on <http://www.wellingtonfunds.com>.

## DEFINITIONS

<b>Accumulating Shares</b>	means Shares that accumulate income and pay no distribution.
<b>ADRs, GDRs and GDNs</b>	means American Depository Receipts, Global Depository Receipts and Global Depository Notes.
<b>Administrator</b>	means State Street Fund Services (Ireland) Limited and any other person or persons for the time being duly appointed administrator in succession to the said State Street Fund Services (Ireland) Limited.
<b>Account Opening Agreement</b>	means the Account Opening Agreement in respect of each Fund.
<b>Articles</b>	means the Articles of Association of the Company as may be amended from time to time.
<b>Associated Person</b>	<p>a person is associated with a Director if, and only if, he is;</p> <ol style="list-style-type: none"><li>1. that Director's spouse, parent, brother, sister or child;</li><li>2. a person acting in his capacity as the trustee of any trust, the principal beneficiaries of which are the Director, his spouse or any of his children or any body corporate which he controls;</li><li>3. a partner of that Director.</li></ol> <p>A company will be deemed to be connected with a director of a company if it is controlled by that director.</p>
<b>Base Currency</b>	means in relation to any Fund such currency used for accounting purposes or to measure the profits and losses of the Shares. The Base Currency for each Fund is set out in the relevant Supplement.
<b>Benchmark Regulations</b>	means Regulation (EU) 2016/1011 of the European Parliament and the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulations (EU) No 596/2014 and (EU) 2021/168.
<b>Bond Connect</b>	means the mutual bond market access program between Hong Kong and PRC, established by China Foreign Exchange Trade System (CFETS) & National Interbank Funding Centre, China Central Depository & Clearing Co., Ltd, Shanghai Clearing House (together, the "Mainland Financial Infrastructure Institutions"), and Hong Kong Exchanges and Clearing Limited and Central Moneymarkets Unit (CMU) (together, the "Hong Kong Financial Infrastructure Institutions", through

	which overseas institutional investors can invest in fixed income securities traded on the China Interbank Bond Market.
<b>'bottom-up' investment</b>	means analysing individual companies to identify their potential to increase their dividends and/or share price focusing on individual stocks (as opposed to top-down investment as defined below), assessing aspects such as their industry leading attributes or considering their financial position relative to their peers.
<b>Business Day</b>	means every day that US Federal banks and the New York Stock Exchange are open for business except for: <ul style="list-style-type: none"> <li>a) Easter Monday</li> <li>b) May 1<sup>st</sup></li> <li>c) the weekday prior to and following Christmas Day as observed by the New York Stock Exchange</li> <li>d) such other days as the Directors may from time to time determine</li> </ul>
<b>Central Bank</b>	means the Central Bank of Ireland or any successor authority.
<b>Central Bank's UCITS Regulations</b>	means the Central Bank (Supervision and Enforcement) Act 2013 (Section 48(1)) (Undertakings for Collective Investment in Transferable Securities) Regulations 2019 as may be amended, supplemented or consolidated from time to time.
<b>China A Shares</b>	means Renminbi denominated "A" shares in mainland China based companies that trade on Chinese stock exchanges such as the Shanghai Stock Exchange and the Shenzhen Stock Exchange.
<b>CIBM</b>	means the China Interbank Bond Market which is an OTC fixed income market established in the PRC in 1997. On the CIBM, institutional investors (including domestic and overseas institutional investors) trade sovereign, government and corporate bonds.
<b>CIS</b>	means collective investment scheme.
<b>Class, Classes, Share Class or Share Classes</b>	any class of Share issued in respect of any Fund as set out in this Prospectus.
<b>Company</b>	means Wellington Management Funds (Ireland) plc.
<b>Connected Person</b>	means the persons defined as such in the section entitled <b>Fund Transactions and Conflicts of Interest</b> .
<b>Covered Person</b>	means (i) any person who is an executive officer or director of (a) a company that is registered under Section 12 of the US Securities Exchange Act or files periodic reports pursuant to

Section 15(d) thereof or (b) a “covered non-public company” as defined in Rule 5131 of the Conduct Rules of the US Financial Industry Regulatory Authority, (ii) any person materially supported by a person described in (i) above, or (iii) any entity in which a persons described in (i) and (ii) above have aggregate beneficial interests in excess of 25%.

**Depository**

means State Street Custodial Services (Ireland) Limited or any other person or persons for the time being duly appointed Depository hereof in succession to State Street Custodial Services (Ireland) Limited.

**Dealing Currency**

means in relation to any Class of Shares such currency as is used for subscription and redemption purposes.

**Dealing Day/Non-Dealing Day**

Dealing Day means a Business Day when a Fund will publish a valuation and Shares will normally be issued or redeemed by a Fund.

Notwithstanding this, the Directors may decide that some Business Days will be Non-Dealing Days for certain Funds as a result of prevailing market conditions or other relevant factors applicable to a portion of the Fund’s assets, including public holidays, market/stock exchange closures or trading restrictions.

. A list of the Non-Dealing Days (the “Holiday Calendar”) is set out in the Investor Notices and Policies section at [www.wellingtonfunds.com](http://www.wellingtonfunds.com). Please note that the Holiday Calendar will be kept up to date and may change from time to time.

In the event that an unexpected Non-Dealing Day is called for a Fund in the circumstances described above (including any period immediately preceding or following any such event, as necessary from an operational perspective), this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](http://wellington.com).

**Dealing Deadline**

means the deadline for subscription, conversion and redemption orders to be received by the Transfer Agent, which is 2:00 pm Ireland time. The Dealing Deadline is set out for each Fund in the relevant Supplement.

The Directors reserve the right to change the Dealing Deadline for all Funds as long as it is not after the Valuation Point.

**Directors**

means the directors of the Company.

<b>Distributing Shares or Distributing Share Class</b>	means Shares or a Share Class where the Shareholder is eligible to receive distributions as calculated and determined by the Company in the manner described in the <b>Distribution Policy</b> section above and the relevant Fund Supplement.
<b>Distribution and/or distribution</b>	means a payment of a dividend by the Company in accordance with the Prospectus and Supplements.
<b>Distributor</b>	means Wellington Global Administrator, Ltd.
<b>EEA</b>	means the European Economic Area.
<b>EU</b>	means the European Union.
<b>EU Taxonomy</b>	means Regulation (EU) 2020/852 (Taxonomy) on the establishment of a framework to facilitate sustainable investment.
<b>EU Member State</b>	means a member of the EU.
<b>Fitch</b>	means Fitch ratings, the international rating agency.
<b>Force Majeure Events</b>	shall mean natural or environmental disasters or other events outside of the reasonable control of the Company or the Investment Manager, including, for example, flood, drought, earthquake, epidemic, pandemic, terrorist attack, civil war, civil commotion, riots, war, threat of or preparation for war, armed conflict, imposition of sanctions, embargo, breaking off of diplomatic relations, nuclear, chemical or biological contamination, legal or regulatory action taken by a government or public authority, labor or trade disputes, strikes, industrial actions or lockouts.
<b>Foreign Person</b>	means (i) a person who is neither resident nor ordinarily resident in Ireland for tax purposes who has provided the Company with the appropriate declaration under Schedule 2B TCA and the Company is not in possession of any information that would reasonably suggest that the declaration is incorrect or has at any time been incorrect or (ii) the company is in possession of written notice of approval from the Revenue Commissioners to the effect that the requirement to have been provided with such declaration is deemed to have been complied with in respect of that person or class of shareholder to which that person belongs, and that approval has not been withdrawn and any conditions to which that approval is subject to have been satisfied.
<b>Fund(s)</b>	means each of the sub-funds of the Company authorised by the Central Bank at the date of this Prospectus and any other

sub-funds which may be established from time to time by the Company.

**Global Supplement**

means a supplement to the Prospectus issued on behalf of the Company for the purpose of listing the existing sub-funds of the Company;

**Group Companies**

means companies which are included in the same group for the purposes of consolidated accounts, as defined in accordance with Directive 83/349/EEC or in accordance with international accounting rules.

**Hedged Share Class and SC Share Classes**

means a Share Class in respect of which the Company will enter into derivative transactions, the benefits and costs of which will accrue solely to Shareholders in that Share Class.

**Initial Issue Price**

means the price per Share at which Shares are or were initially offered in a Fund during the Initial Offer Period specified in the Supplement for the relevant Fund.

**Initial Offer Period**

means the period during which Shares in a Fund are offered at the Initial Issue Price, which period may be extended or shortened at the discretion of the Directors. The Initial Offer Period for each Fund is set out, where relevant, in the relevant Supplement. The Investor Guide details the status of all the Share Classes, including whether their Initial Offer Period has closed.

**Institutional Investor**

Including but not limited to the following:

- banks and other professionals of the financial sector investing
  - in their own name and on their behalf
  - in their own name and on behalf of Institutional Investors
  - in their own name and on behalf of another party which is not an Institutional Investor, provided such party
    - entered into a discretionary management agreement, and
    - does not have a right or claim over the relevant Fund i.e., the sole rights must rest with the bank or the other professional of the financial sector
- re-/insurance companies
  - if investing as part of fund-linked insurance products and the beneficial owners are not Institutional Investors, only if the beneficial owners have no direct access to the relevant Fund's assets, and the insurance companies are the sole persons with a title to these assets
- collective investment schemes



- social security institutions
- pension funds
- industrial and financial groups
- structures the Institutional Investors stated above set up for the management of their assets
- holding companies or their equivalent
  - provided all shareholders are Institutional Investors, or
  - can prove real substance and have their own structure and activity (i.e., they are holding interests in entities of financial or industrial groups which have a real economic activity)
- family holding companies or their equivalent which are companies through which a family, or a branch of it, is holding important financial interests by means of participating in entities having an economic activity, irrespective that their shareholders are not Institutional Investors themselves
- regional and local authorities such as regions, provinces, districts, villages or municipalities investing their own funds.

**Investment Manager** means any investment manager(s) appointed by the Management Company or any successor thereto duly appointed in accordance with the requirements of the Central Bank as specified in the Supplement in respect of each Fund as the investment manager for that relevant Fund.

**Investor Guide** means the guide to dealing procedures for the Funds.

**Key Investor Document** means any Key Investor Document issued by the Company in respect of the Funds from time to time.

**Level II SFDR Regulatory Technical Standards** means Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council.

**Management Company** means Wellington Luxembourg S.à.r.l.

**Minimum Holding Amount** means such minimum holding amount for Shares in a Class as may be specified in the relevant Supplement for the relevant Class of Shares from time to time.

**Minimum Initial Subscription** means such minimum amount (excluding any preliminary charge) in the relevant Dealing Currency initially subscribed for by each Shareholder for Shares in a Class as may be specified in the relevant Supplement for the relevant Class of Shares.

**Minimum Subsequent**

<b>Subscription</b>	means such minimum amount (excluding any preliminary charge) in the relevant Dealing Currency subsequently subscribed for by each Shareholder for Shares in a Class as may be specified in the relevant Supplement for the relevant Class of Shares.
<b>Money Market Instruments</b>	shall have meaning prescribed to them in the Central Bank's UCITS Regulations.
<b>Moody's</b>	means Moody's Investor Services, Inc.
<b>Net Asset Value or NAV</b>	means in respect of the assets of a Fund or Share Class, the amount determined in accordance with the provisions set out in the section entitled <b>Dealing in Shares</b> .
<b>Net Credit Exposure</b>	means the net loss a Fund would experience from an immediate, no recovery, default by a particular issuer or group of issuers, including any gains or losses on derivative positions, according to the Investment Manager's standard calculation, applied in good faith and in accordance with accepted industry practice.
<b>OECD</b>	means the Organisation for Economic Co-operation and Development.
<b>PAIs</b>	means Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards.
<b>Paris Agreement</b>	means the legally binding international treaty on climate change. It was adopted by 196 Parties at COP 21 in Paris, on 12 December 2015 and entered into force on 4 November 2016. Its goal is to limit global warming to well below 2°C (preferably 1.5°C) compared to preindustrial levels. To meet this goal, greenhouse gas emissions must peak as soon as possible, and net-zero emissions must be achieved by 2050.
<b>PRC</b>	means the People's Republic of China.
<b>Prospectus</b>	the current prospectus of the Company and any Supplements and addenda thereto.
<b>Redemption or Redeem</b>	means the repurchase of Shares by the Company.
<b>Regulations</b>	means the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352) as may be amended, supplemented or consolidated from time to time, and includes any conditions that may from time to time be imposed thereunder by the Central Bank whether by notice or otherwise affecting the Company.

<b>Restricted Person</b>	means any person or entity defined as such in Rule 5130 of the Conduct Rules of the US Financial Industry Regulatory Authority.
<b>Rupee</b>	means the currency of India.
<b>Settlement Date</b>	whether for payment of Shares subscribed for or the payment of redemption proceeds, shall have the meaning set out in the relevant Supplement.
<b>SFDR</b>	Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on Sustainability-Related Disclosures in the Financial Services Sector.
<b>Shares</b>	means participating shares in the Company and includes, where the context so permits or requires, the Shares in a Fund.
<b>Shareholders</b>	means holders of Shares, and each a “Shareholder”.
<b>Standard &amp; Poor’s</b>	means Standard & Poor’s Ratings Services.
<b>Stock Connect</b>	means (i) Shanghai-Hong Kong Stock Connect, the mutual market access program through which foreign investors can deal in select China A Shares listed on the Shanghai Stock Exchange (SSE) through the Stock Exchange of Hong Kong (SEHK) and (ii) the Shenzhen-Hong Kong Stock Connect, the mutual market access program through which foreign investors can deal in select China A Shares listed on the Shenzhen Stock Exchange (SZSE) through the SEHK.
<b>Supplement</b>	means any supplement in respect of a Fund, including any addenda thereto, to the Prospectus issued by or on behalf of the Company from time to time.
<b>Sustainability Factors</b>	means environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.
<b>Sustainability Risk</b>	means an environmental, social or governance event or condition that, if it occurs, could cause an actual or potential material negative impact on the value of an investment.
<b>Sustainable Investments</b>	shall have the meaning prescribed to it in the section entitled Sustainable Investments.
<b>Taxable Irish Person</b>	means any person, other than: <ul style="list-style-type: none"> <li>(i) a Foreign Person;</li> <li>(ii) an intermediary, including a nominee, for a Foreign Person;</li> </ul>

- (iii) a qualifying management company within the meaning of section 739B TCA;
- (iv) a specified company within the meaning of section 734 TCA;
- (v) an investment undertaking within the meaning of section 739 B TCA;
- (vi) an investment limited partnership within the meaning of section 739J TCA;
- (vii) an exempt approved scheme or a retirement annuity contract or trust scheme within the provisions of sections 774, 784 or 785 TCA;
- (viii) a company carrying on life business within the meaning of section 706 TCA;
- (ix) a special investment scheme within the meaning of section 737 TCA;
- (x) a unit trust to which section 731(5)(a) TCA applies;
- (xi) a charity entitled to an exemption from income tax or corporation tax under section 207(1)(b) TCA;
- (xii) a person entitled to exemption from income tax and capital gains tax under section 784A(2) TCA, section 787I TCA or section 848E TCA and the units held are assets of an approved retirement fund, an approved minimum retirement fund, a special savings incentive account or a personal savings retirement savings account (as defined in section 787A TCA);
- (xiii) the Courts Service within the meaning of section 4 of the Courts Service Act, 1998;
- (xiv) a Credit Union within the meaning of section 2 of the Credit Union Act, 1997;
- (xv) a company within the charge to corporation tax under section 739G(2) TCA, but only where the Fund is a money market fund;
- (xvi) a company within the charge to corporation tax under section 110(2) TCA;
- (xvii) the National Asset Management Agency;

- (xviii) the National Treasury Management Agency or a Fund Investment vehicle within the meaning of Section 739D (6) (kb) TCA;
- (xix) the State acting through the National Pensions Reserve Fund Commission or any other person as may be approved by the Directors from time to time provided the holding of Shares by such person does not result in a potential liability to tax arising to the Company in respect of that Shareholder under section 739 TCA; and
- (xx) any other person as may be approved by the directors from time to time provided the holding of Shares by such persons does not result in a potential liability to tax arising to the Company in respect of that Shareholder under Part 27 Chapter 1A TCA.

in respect of each of which the appropriate declaration set out in Schedule 2B TCA or otherwise and such other information evidencing such status is in the possession of the Company on the appropriate date.

**TCA**

means the Taxes Consolidation Act, 1997, as amended.

**'top-down' investment**

means looking at the big picture first, e.g. analyzing countries' economies, or a sector or industry as a whole by looking at factors such as gross domestic product or unemployment rates, to identify the best countries, sectors or industries to invest in. Once the Investment Manager has identified the best areas to focus on, the Investment Manager may look for individual companies to invest in that best reflect these trends (see 'bottom-up investment above).

**Transferable Securities**

Transferable Securities shall have the meaning prescribed to them in the Regulations.

**Transfer Agent**

means State Street Fund Services (Ireland) Limited and any other person or persons for the time being duly appointed registrar and transfer agent in succession to the said State Street Fund Services (Ireland) Limited.

**UCITS**

means an Undertaking for Collective Investment in Transferable Securities.

**UCITS Directive**

means the EC Council Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the Co-ordination of Laws, Regulations and Administrative Provisions relating to UCITS, as amended, supplemented or replaced from time to time.

<b>United Kingdom or UK</b>	means the United Kingdom of Great Britain and Northern Ireland.
<b>United States</b>	means the United States of America, its territories, possessions and all areas subject to its jurisdiction (including the Commonwealth of Puerto Rico).
<b>United States Person or US Person</b>	means, unless otherwise determined by the Directors, any citizen or resident of the United States, any corporation, trust, partnership or other entity created or organised in or under the laws of the United States or any state thereof or having its principal place of business in the United States, any legal entity (other than an entity where all of the owners of the entity have limited liability) that is directly or indirectly majority owned by United States Persons and in which such persons bear unlimited responsibility for the obligations and liabilities of such entity, any collective investment vehicle that is majority owned by United States Persons, or any estate or trust the income of which is subject to United States federal income tax, regardless of source.
<b>US Dollars or USD</b>	means the currency of the United States.
<b>Valuation Point</b>	means the point in time when a Fund's investments are valued and the Net Asset Value of the Fund is determined. The valuation point is 4pm New York time on the relevant Business Day (or such other time as may be specified in the relevant supplement).

• APPENDIX I

MARKETS

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The markets set out below are listed in accordance with the requirements of the Central Bank. The Central Bank does not issue a list of approved markets.

With the exception of permitted investment in unlisted securities or in units of open-ended collective investment schemes, investment will be limited to the following stock exchanges and regulated markets (Market):-

1.

(i) any stock exchange which is:

- located in any Member State other than Malta; or
- located in a member state of the European Economic Area (being Norway and Iceland but excluding Liechtenstein); or
- located in any of the following countries:-
  - Australia
  - Canada
  - Hong Kong
  - Japan
  - New Zealand
  - Switzerland
  - United States of America
  - United Kingdom; or

(ii) any stock exchange included in the following list of countries:

Albania	-	Tirana Stock Exchange
Argentina	-	Bolsa de Comercio de Buenos Aires, Cordoba, Mendoza, Rosario and La Plata Stock Exchange;
Bahrain	-	Bahrain Stock Exchange;
Bangladesh	-	Chittagong Stock Exchange and Dhaka Stock Exchange;
Bermuda	-	Bermuda Stock Exchange
Botswana	-	Botswana Stock Exchange;
Brazil	-	B3;
Chile	-	Santiago Stock Exchange and Valparaiso Stock Exchange;
China	-	Shanghai Stock Exchange, Fujian Stock Exchange,

			Hainan Stock Exchange and Shenzhen Stock Exchange;
	Colombia	-	Bolsa de Valores de Colombia
	Costa Rica	-	Bolsa Nacional de Valores;
	Egypt	-	Egyptian Exchange
	Eswatini	-	Eswatini Stock Exchange;
	Ghana	-	Ghana Stock Exchange;
	India	-	Mumbai Stock Exchange, Madras Stock Exchange, Delhi Stock Exchange, Ahmedabad Stock Exchange, Bangalore Stock Exchange, Cochin Stock Exchange, Guwahati Stock Exchange, Magadh Stock Exchange, Pune Stock Exchange, Hyderabad Stock Exchange, Ludhiana Stock Exchange, Uttar Pradesh Stock Exchange, Calcutta Stock Exchange and the National Stock Exchange of India;
	Indonesia	-	Jakarta Stock Exchange and Surabaya Stock Exchange;
	Israel	-	Tel Aviv Stock Exchange;
	Ivory Coast	-	Abidjan Stock Exchange;
	Jordan	-	Amman Stock Exchange;
	Kazakhstan	-	Kazakhstan Stock Exchange;
	Kenya	-	Nairobi Stock Exchange;
	Korea (Republic of)	-	Korean Stock Exchange;
	Kuwait	-	Kuwait Stock Exchange;
	Malaysia	-	Kuala Lumpur Stock Exchange;
	Malawi	-	Malawi Stock Exchange;
	Mauritius	-	Stock Exchange of Mauritius;
	Mexico	-	Bolsa Mexicana de Valores;
	Morocco	-	Casablanca Stock Exchange;
	Namibia	-	Namibian Stock Exchange;
	Nigeria	-	Lagos Stock Exchange, Kaduna Stock Exchange and Port Harcourt Stock Exchange;
	Oman	-	Muscat Securities Market;
	Pakistan	-	Lahore Stock Exchange and Karachi Stock Exchange;
	Panama	-	Panama Stock Exchange;
	Peru	-	Bolsa de Valores de Lima ;



	Philippines	-	Philippines Stock Exchange;
	Qatar	-	Doha Stock Exchange;
	Romania	-	Bucharest Stock Exchange;
	Russia	-	Moscow Stock Exchange;
	Saudi Arabia	-	Saudi Stock Exchange (Tadawul)
	Singapore	-	The Stock Exchange of Singapore;
Exchange;	South Africa	-	Johannesburg Stock
	Sri Lanka	-	Colombo Stock Exchange;
	Taiwan	-	Taipei Stock Exchange Corporation;
Exchange;	Tanzania	-	Dar-es-Salaam Stock
	Thailand	-	The Stock Exchange of Thailand;
	Tunisia	-	Tunis Stock Exchange;
	Turkey	-	Istanbul Stock Exchange;
	Uganda	-	Uganda Securities Exchange;
	Ukraine	-	Ukrainian Stock Exchange;
	United Arab Emirates	-	Dubai Financial Market and Dubai International Financial Centre
	United Arab Emirates	-	Abu Dhabi Securities Exchange
	United Arab Emirates	-	Dubai Stock Exchange
	Uruguay	-	Montevideo Stock Exchange;
	Vietnam	-	Ho Chi Minh Exchange and Hanoi Stock Exchange;
	Zambia	-	Lusaka Stock Exchange;
	Zimbabwe	-	Zimbabwe Stock Exchange;

(iii) any of the following:

The market organised by the International Capital Markets Association;

The UK market (i) conducted by banks and other institutions regulated by the FCA and subject to the Inter-Professional Conduct provisions of the FCA's Market Conduct Sourcebook; and (ii) in non-investment products which is subject to the guidance contained in the "Non-Investment Products Code" drawn up by the participants in the London market, including the FCA and the Bank of England (formerly known as the Grey Paper);

The "listed money market institutions" as described in the Bank of England publication "The Regulation of the Wholesale Cash and OTC Derivatives Market in Sterling, Foreign Currency and Bullion" dated April, 1988 (as amended from time to time);

The market in US government securities conducted by primary dealers regulated by the Federal Reserve Bank of New York;

The over-the-counter market in the United States regulated by the Financial Industry Regulatory Authority Inc. (FINRA), also described as the over-the-counter market in the United States conducted by primary and secondary dealers regulated by the Securities and Exchanges Commission and/or by the FINRA (and by banking institutions regulated by the U.S. Comptroller of the Currency, the Federal Reserve System or Federal Deposit Insurance Corporation);

NYSE Euronext;

NASDAQ in the United States;

The over-the-counter market in Japan regulated by the Securities Dealers Association of Japan;

The Over-the-Counter market in Canadian Government Bonds as regulated by the Investment Dealers Association of Canada;

The French market for "Titres de Creance Negotiable" (over-the-counter market in negotiable debt instruments); and

AIM-the Alternative Investment Market in the UK regulated and operated by the London Stock Exchange.

China Interbank Bond Market

2. In relation to any derivatives contract used, any market or exchange on which such contract may be acquired or sold which is referred to in clause 1 (i), (ii) or (iii) above or which is in the European Economic Area or in the United Kingdom, and/or is regulated, recognised, operates regularly, and is open to the public including the Korean Futures Exchange, the Singapore Monetary Exchange, MEFF, South Africa Futures Exchange (SAFEX), TSX Group Exchange and ICE Futures Europe.

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• **APPENDIX II**

**INVESTMENT RESTRICTIONS APPLICABLE TO THE FUNDS**

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The particular investment restrictions for each Fund will be formulated by the Directors at the time of the creation of the Fund and are set out in Supplement for each Fund.

Details of the investment restrictions laid down in accordance with the Regulations, in respect of each Fund are set out below:

**1. Permitted Investments**

Investments of a Fund are confined to:

- 1.1 Transferable Securities and Money Market Instruments which are either admitted to official listing on a stock exchange in an EU Member State or non-EU Member State or which are dealt on a market which is regulated, operates regularly, is recognised and open to the public in an EU Member State or non-EU Member State.
- 1.2 recently issued Transferable Securities which will be admitted to official listing on a stock exchange or other market (as described above) within a year.
- 1.3 Money Market Instruments other than those dealt on a regulated market.
- 1.4 shares of UCITS.
- 1.5 shares of AIFs as set out in the Regulations.
- 1.6 deposits with credit institutions as prescribed in the Regulations.
- 1.7 financial derivative instruments as prescribed in the Regulations.

**2. Investment Limits**

- 2.1 A Fund may invest no more than 10% of net assets in Transferable Securities and Money Market Instruments other than those referred to in paragraph 1.
- 2.2 A Fund may invest no more than 10% of net assets in recently issued Transferable Securities which will be admitted to official listing on a stock exchange or other market (as described in paragraph 1.1) within a year. This restriction will not apply in relation to investment by a Fund in certain US securities known as Rule 144A securities provided that:
  - 2.2.1 the securities are issued with an undertaking to register with the US Securities and Exchange Commission within one year of issue; and
  - 2.2.2 the securities are not illiquid securities i.e. they may be realised by a Fund within seven days at the price, or approximately at the price, at which they are valued by a Fund.

- 2.3 A Fund may invest no more than 10% of net assets in Transferable Securities or Money Market Instruments issued by the same body provided that the total value of Transferable Securities and Money Market Instruments held in the issuing bodies in each of which it invests more than 5% is less than 40%.
- 2.4 Subject to the prior approval of the Central Bank, the limit of 10% (in 2.3) is raised to 25% in the case of bonds that are falling under the definition of covered bonds in point (1) of Article 3 of Directive (EU) 2019/2162 of the European Parliament and of the Council of 27 November 2019 amending Regulation (EU) No 575/2013 as regards exposures in the form of covered bonds. If a Fund invests more than 5% of its net assets in these bonds issued by one issuer, the total value of these investments may not exceed 80% of the Net Asset Value of the Fund.
- 2.5 The limit of 10% (in 2.3) is raised to 35% if the Transferable Securities or Money Market Instruments are issued or guaranteed by an EU Member State or its local authorities or by a non-EU Member State or public international body of which one or more EU Member States are members.
- 2.6 The Transferable Securities and Money Market Instruments referred to in 2.4. and 2.5 shall not be taken into account for the purpose of applying the limit of 40% referred to in 2.3.
- 2.7 A Fund may not invest more than 20% of net assets in deposits made with the same credit institution.

Deposits or cash booked in accounts and held as ancillary liquidity shall only be made with a credit institution, which is within one of the following categories

- a credit institution authorised in the EEA (European Union Member States, Norway, Iceland, Liechtenstein);
- a credit institution authorised within a signatory state (other than an EEA Member State) to the Basel Capital Convergence Agreement of July 1988 (Switzerland, Canada, Japan, United States, United Kingdom); or
- a credit institution in a third country deemed equivalent pursuant to Article 107(4) of the Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012.

Cash booked in accounts and held as ancillary liquidity shall not exceed 20% of the net assets of a Fund.

- 2.8 The risk exposure of a UCITS to a counterparty to an over-the-counter (OTC) derivative may not exceed 5% of net assets.

This limit is raised to 10% in the case of a credit institution authorised in the EEA; a credit institution authorised within a signatory state (other than an EEA Member State) to the Basel Capital Convergence Agreement of July 1988 (Switzerland, Canada, Japan, United States, United Kingdom); or a credit institution authorised in Jersey, Guernsey, the Isle of Man, Australia or New Zealand.

2.9 Notwithstanding paragraphs 2.3, 2.7 and 2.8 above, a combination of two or more of the following issued by, or made or undertaken with, the same body may not exceed 20% of net assets:

2.8.1 investments in Transferable Securities or Money Market Instruments;

2.8.2 deposits, and/or

2.8.3 risk exposures arising from OTC derivatives transactions.

2.10 The limits referred to in 2.3, 2.4, 2.5, 2.7, 2.8 and 2.9 above may not be combined, so that exposure to a single body shall not exceed 35% of net assets.

2.11 Group Companies are regarded as a single issuer for the purposes of 2.3, 2.4, 2.5, 2.7, 2.8 and 2.9. However, a limit of 20% of net assets may be applied to investment in Transferable Securities and Money Market Instruments within the same group.

2.12 A Fund may invest up to 100% of net assets in different Transferable Securities and Money Market Instruments issued or guaranteed by any EU Member State, its local authorities, non-EU Member States or public international bodies of which one or more EU Member States are members. The following are permitted issuers for the purposes of this investment restriction:

An OECD member country (provided it is of investment grade),  
Government of Brazil (provided the issues are of investment grade),  
Government of India (provided the issues are of investment grade),  
Government of Singapore,  
European Investment Bank,  
European Bank for Reconstruction and Development,  
International Finance Corporation,  
International Monetary Fund,  
Euratom,  
The Asian Development Bank,  
European Central Bank,  
Council of Europe,  
Eurofima,  
African Development Bank,  
International Bank for Reconstruction and Development (The World Bank),  
The Inter-American Development Bank,  
European Union,  
Federal National Mortgage Association (Fannie Mae),  
Federal Home Loan Mortgage Corporation (Freddie Mac),  
Government National Mortgage Association (Ginnie Mae),  
Student Loan Marketing Association (Sallie Mae),  
Federal Home Loan Bank,  
Federal Farm Credit Bank,  
Tennessee Valley Authority,  
Straight-A Funding LLC,  
Export-Import Bank.

The Fund must hold securities from at least six different issues, with securities from any one issue not exceeding 30% of net assets.

### **3. Investment in Collective Investment Schemes (CIS)**

- 3.1 A Fund may not invest more than 10% of net assets in aggregate in shares or units of any other CIS.
- 3.2 The CIS must be prohibited from investing more than 10% of net assets in other CIS.
- 3.3 When a Fund invests in the units of other CIS that are managed, directly or by delegation, by the Management Company, Investment Manager or by any other company with which the Management Company or Investment Manager or the Company is linked by common management or control, or by a substantial direct or indirect holding of more than 10% of the capital or votes, the Management Company, the Investment Manager or other company or applicable may not charge subscription, exchange or redemption fees on account of the Fund investment in the units of such other CIS. Moreover, in such a case, no management fee may be charged to the Fund's assets.
- 3.4 Where a commission (including a rebated commission) is received by the Management Company, or the Investment Manager by virtue of an investment in the units of another CIS, this commission must be paid into the property of the Fund.

### **4. Index Tracking UCITS**

- 4.1 A Fund may invest up to 20% of net assets in shares and/or debt securities issued by the same body where the investment policy of a Fund is to replicate an index, which satisfies the criteria set out in the Central Bank's Rulebook and is recognised by the Central Bank.
- 4.2 The limit in 4.1 may be raised to 35%, and applied to a single issuer, where this is justified by exceptional market conditions.

### **5. General Provisions**

- 5.1 The Company or Management Company acting in connection with all of the CIS it manages, may not acquire any shares carrying voting rights which would enable it to exercise significant influence over the management of an issuing body.
- 5.2 A Fund may acquire no more than:
  - 5.2.1 10% of the non-voting shares of any single issuing body;
  - 5.2.2 10% of the debt securities of any single issuing body;
  - 5.2.3 25% of the units of any single CIS;
  - 5.2.4 10% of the Money Market Instruments of any single issuing body.

The limits laid down in 5.2.2, 5.2.3 and 5.2.4 above may be disregarded at the time of acquisition if at that time the gross amount of the debt securities or of the Money Market Instruments, or the net amount of the securities in issue cannot be calculated.

- 5.3 5.1 and 5.2 shall not be applicable to:

- 5.3.1 Transferable Securities and Money Market Instruments issued or guaranteed by an EU Member State or its local authorities;
  - 5.3.2 Transferable Securities and Money Market Instruments issued or guaranteed by a non-EU Member State;
  - 5.3.3 Transferable Securities and Money Market Instruments issued by public international bodies of which one or more EU Member States are members;
  - 5.3.4 shares held by a UCITS in the capital of a company incorporated in a non-EU Member State which invests its assets mainly in the securities of issuing bodies having their registered offices in that State, where under the legislation of that State such a holding represents the only way in which the UCITS can invest in the securities of issuing bodies of that State. This waiver is applicable only if in its investment policies the company from the non-EU Member State complies with the limits laid down in 2.3 to 2.11, 3.1, 3.2, 5.1, 5.2, 5.4, 5.5 and 5.6 and provided that where these limits are exceeded, paragraphs 5.5 and 5.6 below are observed;
  - 5.3.5 shares held by an investment company in the capital of subsidiary companies carrying on only the business of management, advice or marketing in the country where the subsidiary is located, in regard to the repurchase of units at shareholders' request exclusively on their behalf.
- 5.4 A Fund need not comply with the investment restrictions herein when exercising subscription rights attaching to Transferable Securities or Money Market Instruments which form part of their assets.
- 5.5 The Central Bank may allow recently authorised UCITS to derogate from the provisions of 2.3 to 2.12, 3.1, 3.2, 4.1 and 4.2 for six months following the date of their authorisation, provided they observe the principle of risk spreading.
- 5.6 A Fund may not carry out uncovered sales or physical shorting of:
- 5.6.1 Transferable Securities;
  - 5.6.2 Money Market Instruments;
  - 5.6.3 units of CIS; or
  - 5.6.4 financial derivative instruments.
- 5.7 A Fund may hold ancillary liquid assets.
- 6. Financial Derivative Instruments (FDIs)**
- 6.1 A Fund may invest in FDIs dealt in over-the-counter (OTC) provided that the counterparties to the OTC transactions are institutions subject to prudential supervision and belonging to categories approved by the Central Bank.

- 6.2 Position exposure to the underlying assets of FDIs, including embedded FDIs in Transferable Securities or Money Market Instruments, when combined where relevant with positions resulting from direct investments, may not exceed the investment limits set out in the UCITS Regulations. (This provision does not apply in the case of index-based FDIs provided the underlying index is one which meets with the criteria set out in the UCITS Regulations.)
- 6.3 The UCITS global exposure (as prescribed in the Regulations) relating to FDIs must not exceed its total Net Asset Value.
- 6.4 Investment in FDIs is subject to the conditions and limits laid down by the Central Bank.

It is intended that the Company should have the power to avail of any change in the law, regulations or guidelines which would permit investment in assets and securities on a wider basis.

Compliance with the investment restrictions noted above is measured at the time of purchase.

If the limits set forth above are exceeded for reasons beyond the control of the Investment Manager (such as market movements) or as a result of the exercise of subscription rights, the Company shall adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interests of Shareholders.



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- APPENDIX III

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The types of Share Class available for each Fund is stated in each Supplement.

Each Share Class is available in each of the following Dealing Currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK.

Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. There may be Distributing Share Classes available with different distribution type and distribution frequencies, as further described in the **Distribution Policy** section and the relevant Supplement.

Each Share Class (save for the SB, TB, SC, TC and BRL Share Classes) in each Dealing Currency in each Fund is available as both a Hedged Share Class and an unhedged Share Class. The SB and TB Share Classes are only available as unhedged Base Currency denominated Share Classes, the BRL Share Classes are only available as hedged Base Currency denominated Share Classes and the SC and TC Share Classes are only available in the above non-Base Currency Dealing Currencies with the Share Class level currency hedging transactions described in the section entitled **Other Share Class Transactions**.

The Minimum Initial Subscription and Minimum Holding Amounts are the following USD amounts or the equivalent to the USD amount in the Dealing Currency of the relevant Share Class.

S, T, NI, NR, G, E, SB, SC, TB, TC Share Classes – USD 5 million  
BN, D, N, DL, ED, EN, GD, GN, GR, R Share Classes – USD 5,000  
SP Share Classes – USD 300 million

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000.

\* Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

The Minimum Subsequent Subscription for each Share Class is USD 1,000 or the USD equivalent in the relevant Dealing Currency of that Share Class.

• APPENDIX IV

The Depository has appointed State Street Bank and Trust Company with registered office at One Congress Street, Suite 1, Boston, MA 02114-2016 as its global sub-custodian.

State Street Bank and Trust Company as global sub-custodian has appointed local sub-custodians within the State Street Global Custody Network as listed below, as at the date of this prospectus. The list is subject to change and a current list is available upon request from the Transfer Agent or the Investment Manager.

Market	Sub-custodian
Albania	Raiffeisen Bank sh.a.
Australia	The Hongkong and Shanghai Banking Corporation Limited
Austria	Deutsche Bank AG
	UniCredit Bank Austria AG
Argentina	Citibank, N.A.
Bahrain	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Bangladesh	Standard Chartered Bank
Belgium	Deutsche Bank AG, Netherlands (operating through its Amsterdam branch with support from its Brussels branch)
Benin	via Standard Chartered Bank Côte d'Ivoire S.A., Abidjan, Ivory Coast
Bermuda	HSBC Bank Bermuda Limited
Federation of Bosnia and Herzegovina	UniCredit Bank d.d.
Botswana	Standard Chartered Bank Botswana Limited
Brazil	Citibank, N.A.
Bulgaria	Citibank Europe plc, Bulgaria Branch
	UniCredit Bulbank AD
Burkina Faso	via Standard Chartered Bank Côte d'Ivoire S.A., Abidjan, Ivory Coast
Canada	State Street Trust Company Canada
Chile	Itaú CorpBanca S.A.
People's Republic of China	HSBC Bank (China) Company Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)

	China Construction Bank Corporation
China Connect	Citibank N.A.
	The Hongkong and Shanghai Banking Corporation Limited
	Standard Chartered Bank (Hong Kong) Limited
Colombia	Cititrust Colombia S.A. Sociedad Fiduciaria
Costa Rica	Banco BCT S.A.
Croatia	Privredna Banka Zagreb d.d.
	Zagrebacka Banka d.d.
Cyprus	BNP Paribas Securities Services, S.C.A., Greece (operating through its Athens branch)
Czech Republic	Československá obchodní banka, a.s.
	UniCredit Bank Czech Republic and Slovakia, a.s.
Denmark	Skandinaviska Enskilda Banken AB (publ), Sweden (operating through its Copenhagen branch)
Egypt	Citibank, N.A.
Estonia	AS SEB Pank
Eswatini	Standard Bank Eswatini Limited
Finland	Skandinaviska Enskilda Banken AB (publ), Sweden (operating through its Helsinki branch)
France	Deutsche Bank AG, Netherlands (operating through its Amsterdam branch with support from its Paris branch)
Republic of Georgia	JSC Bank of Georgia
Germany	State Street Bank International GmbH
	Deutsche Bank AG
Ghana	Standard Chartered Bank Ghana Limited
Greece	BNP Paribas Securities Services, S.C.A.
Guinea-Bissau	via Standard Chartered Bank Côte d'Ivoire S.A., Abidjan, Ivory Coast
Hong Kong	The Hongkong and Shanghai Banking Corporation Limited
Hungary	Citibank Europe plc Magyarországi Fióktelepe
	UniCredit Bank Hungary Zrt.
Iceland	Landsbankinn hf.
India	Deutsche Bank AG
	Citibank, N.A.
Indonesia	Deutsche Bank AG
Ireland	State Street Bank and Trust Company, United Kingdom branch
Israel	Bank Hapoalim B.M.
Italy	Deutsche Bank S.p.A.
	Intesa Sanpaolo S.p.A.
Ivory Coast	Standard Chartered Bank Côte d'Ivoire S.A.

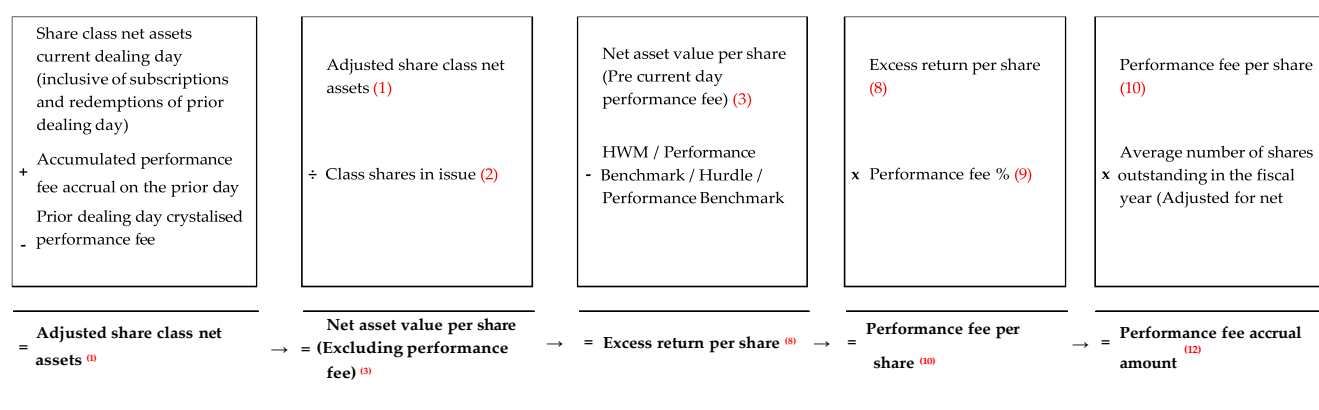
Japan	Mizuho Bank, Limited
	The Hongkong and Shanghai Banking Corporation Limited
Jordan	Standard Chartered Bank
Kazakhstan	JSC Citibank Kazakhstan
Kenya	Standard Chartered Bank Kenya Limited
Republic of Korea	Deutsche Bank AG
	The Hongkong and Shanghai Banking Corporation Limited
Kuwait	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Latvia	AS SEB banka
Lithuania	AB SEB bankas
Malawi	Standard Bank PLC
Malaysia	Deutsche Bank (Malaysia) Berhad
	Standard Chartered Bank Malaysia Berhad
Mali	via Standard Chartered Bank Côte d'Ivoire S.A., Abidjan, Ivory Coast
Mauritius	The Hongkong and Shanghai Banking Corporation Limited
Mexico	Banco Nacional de México, S.A.
Morocco	Citibank Maghreb S.A.
Namibia	Standard Bank Namibia Limited
Netherlands	Deutsche Bank AG
New Zealand	The Hongkong and Shanghai Banking Corporation Limited
Niger	via Standard Chartered Bank Côte d'Ivoire S.A., Abidjan, Ivory Coast
Nigeria	Stanbic IBTC Bank Plc.
Norway	Skandinaviska Enskilda Banken AB (publ), Sweden (operating through its Oslo branch)
Oman	HSBC Bank Oman S.A.O.G. (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Pakistan	Deutsche Bank AG
Panama	Citibank, N.A.
Peru	Citibank del Perú, S.A.
Philippines	Deutsche Bank AG
Poland	Bank Handlowy w Warszawie S.A.
Portugal	Deutsche Bank AG, Netherlands (operating through its Amsterdam branch with support from its Lisbon branch)

Qatar	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Romania	Citibank Europe plc, Dublin – Romania Branch
Russia	AO Citibank
Saudi Arabia	HSBC Saudi Arabia (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
	Saudi British Bank (as delegate of the Hongkong and Shanghai Banking Corporation Limited)
Senegal	via Standard Chartered Bank Côte d’Ivoire S.A., Abidjan, Ivory Coast
Serbia	UniCredit Bank Serbia JSC
Singapore	Citibank N.A.
Slovak Republic	UniCredit Bank Czech Republic and Slovakia, a.s.
Slovenia	UniCredit Banka Slovenija d.d.
South Africa	FirstRand Bank Limited
	Standard Bank of South Africa Limited
Spain	Deutsche Bank S.A.E.
Sri Lanka	The Hongkong and Shanghai Banking Corporation Limited
Republic of Srpska	UniCredit Bank d.d.
Sweden	Skandinaviska Enskilda Banken AB (publ)
Switzerland	Credit Suisse (Switzerland) AG
	UBS Switzerland AG
Taiwan - R.O.C.	Deutsche Bank AG
	Standard Chartered Bank (Taiwan) Limited
Tanzania	Standard Chartered Bank (Tanzania) Limited
Thailand	Standard Chartered Bank (Thai) Public Company Limited
Togo	via Standard Chartered Bank Côte d’Ivoire S.A., Abidjan, Ivory Coast
Tunisia	Union Internationale de Banques
Turkey	Citibank, A.Ş.
	Deutsche Bank A.Ş.
Uganda	Standard Chartered Bank Uganda Limited
Ukraine	JSC Citibank
United Arab Emirates Dubai Financial Market	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)

United Arab Emirates Dubai International Financial Center	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
United Arab Emirates Abu Dhabi	HSBC Bank Middle East Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
United Kingdom	State Street Bank and Trust Company, United Kingdom branch
Uruguay	Banco Itaú Uruguay S.A.
Vietnam	HSBC Bank (Vietnam) Limited (as delegate of The Hongkong and Shanghai Banking Corporation Limited)
Zambia	Standard Chartered Bank Zambia Plc.
Zimbabwe	Stanbic Bank Zimbabwe Limited (as delegate of Standard Bank of South Africa Limited)

• APPENDIX V

The following diagram lays out the steps in the performance fee calculation for Share Classes that levy a performance fee on each Dealing Day. The numerical indicators in the diagram are linked to the table below which gives a numerical example of the performance fee types.



The following tables detail examples of the performance fee experience in share classes that levy a performance fee, with calculation scenarios provided for each of the High Water Mark, Performance Benchmark, Hurdle and Performance Benchmark with a High Water Mark performance fee types. Within each performance fee type, the table details examples of performance fee outcomes that can arise when there is a positive or negative unit class performance.

**Table 1: High Water Mark**

	Year 1	Year 2	Year 3	Year 4	Year 5
NAV per Share at the Beginning of the Fiscal Year	100	107	105	110	118
NAV per Share at the End of The Fiscal Year	107	105	110	118	116
Fund Performance	7%	-2%	5%	7%	-2%
High Water Mark	100 <sup>1</sup>	107 <sup>2</sup>	107	110	118
Relative Performance per Share <sup>3</sup>	7	-2	3	8	-2
	x	x	x	x	x
Average Number of Shares in Issue <sup>4</sup>	1000	1000	800	800	1000
	x	x	x	x	x

<b>Performance Fee Rate</b>	20%	20%	20%	20%	20%
	=	=	=	=	=
<b>Performance Fee Due</b>	1,400	None	480	1,280	None
<b>Appreciation in value / payment of performance fees</b>	<b>YES</b>	<b>NO</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>

<sup>1</sup>During the first performance period, the applicable High Water Mark is the subscription price at the time of issue of that Share class.

<sup>2</sup>After the first performance period the applicable High Water Mark is the NAV recorded at the time the performance fee last crystallized.

<sup>3</sup>Relative Performance is the difference between the NAV per Share at the End of the Fiscal Year and the High Water Mark.

<sup>4</sup>The average number of Shares in issue is reset annually.

**Table 2: Performance Benchmark**

	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
<b>NAV per Share at the Beginning of the Fiscal Year</b>	100	107	105	110	118
<b>NAV per Share at the End of The Fiscal Year</b>	107	105	110	118	116
<b>Fund Performance</b>	7%	-2%	5%	7%	-2%
<b>Benchmark Performance</b>	3%	-3%	9%	2%	4%
<b>Performance Reference Rate at the Beginning of the Period</b>	100 <sup>1</sup>	107 <sup>2</sup>	105	114	118
<b>Benchmark Performance Applied to the Performance Reference Rate</b>	103	104	114	117	123
<b>Relative Performance per Share<sup>3</sup></b>	4	1	-4	1	-7
	x	x	x	x	x
<b>Average Number of Shares in Issue<sup>4</sup></b>	1000	1000	800	800	1000
	x	x	x	x	x
<b>Performance Fee Rate</b>	20%	20%	20%	20%	20%
	=	=	=	=	=
<b>Performance Fee Due</b>	800	200	None	160	None
<b>Appreciation in value / payment of performance fees</b>	<b>YES</b>	<b>YES</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>

<sup>1</sup>During the first performance period, the applicable Performance Reference Rate is the subscription price at the time of issue of that Share class.



<sup>2</sup> After the first performance period the applicable Performance Reference Rate is the NAV per Share at the End of the previous Fiscal Year if the fund was in performance, and if not, the Benchmark Performance Applied to the Performance Reference Rate is carried forward. Relative Performance is the difference between the NAV per Share at the End of the Fiscal Year and the Benchmark Performance Applied to the Performance Reference Rate.

<sup>3</sup> Relative Performance is the difference between the NAV per Share at the End of the Fiscal Year and the Benchmark Performance Applied to the Performance Reference Rate.

<sup>4</sup> The average number of Shares in issue is reset annually.

**Table 3: Hurdle**

	Year 1	Year 2	Year 3	Year 4	Year 5
<b>NAV per Share at the Beginning of the Fiscal Year</b>	100	109	105	126	139
<b>NAV per Share at the End of The Fiscal Year</b>	109	105	126	139	142
<b>Fund Performance</b>	9%	-4%	20%	10%	2%
<b>Hurdle rate</b>	8%	8%	8%	8%	8%
<b>Performance Reference Rate at the Beginning of the Period</b>	100 <sup>1</sup>	109 <sup>2</sup>	118	127	139
<b>Hurdle Applied to the Performance Reference Rate</b>	108	118	127	137	150
<b>Relative Performance per Share<sup>3</sup></b>	1	-13	-1	2	-8
	x	x	x	x	x
<b>Average Number of Shares in Issue<sup>4</sup></b>	1000	1000	800	800	1000
	x	x	x	x	x
<b>Performance Fee Rate</b>	10%	10%	10%	10%	10%
	=	=	=	=	=
<b>Performance Fee Due</b>	100	None	None	160	None
<b>Appreciation in value / payment of performance fees</b>	<b>YES</b>	<b>NO</b>	<b>NO</b>	<b>YES</b>	<b>NO</b>

<sup>1</sup> During the first performance period, the applicable Performance Reference Rate is the subscription price at the time of issue of that share class plus the predefined Hurdle rate.

<sup>2</sup> After the first performance period the applicable Performance Reference Rate is the NAV per Share at the End of the previous Fiscal Year plus the predefined Hurdle rate if the fund was in performance, and if not, the Performance Reference Rate is carried forward plus the predefined Hurdle rate (of the new Fiscal Year).

<sup>3</sup> Relative Performance is the difference between the NAV per Share at the End of the Fiscal Year and the Hurdle Applied to the Performance Reference Rate.

<sup>4</sup> The average number of Shares in issue is reset annually.

**Table 4: Performance Benchmark with a High Water Mark**

	<u>Year 1</u>	<u>Year 2</u>	<u>Year 3</u>	<u>Year 4</u>	<u>Year 5</u>
<u>NAV per Unit at the Beginning of the Fiscal Year</u>	<u>100</u>	<u>107</u>	<u>105</u>	<u>110</u>	<u>118</u>
<u>NAV per Unit at the End of The Fiscal Year</u>	<u>107</u>	<u>105</u>	<u>110</u>	<u>118</u>	<u>116</u>
<u>Fund Performance</u>	<u>7%</u>	<u>-2%</u>	<u>5%</u>	<u>7%</u>	<u>-2%</u>
<u>High Water Mark</u>	<u>100<sup>1</sup></u>	<u>107<sup>2</sup></u>	<u>107</u>	<u>107</u>	<u>118</u>
<u>Benchmark Performance</u>	<u>3%</u>	<u>-3%</u>	<u>9%</u>	<u>2%</u>	<u>4%</u>
<u>Benchmark Performance Adjusted High Water Mark</u>	<u>103</u>	<u>104<sup>3</sup></u>	<u>113</u>	<u>116</u>	<u>123</u>
<u>Maximum of the High Water Mark and the Benchmark Adjusted High Water Mark</u>	<u>103</u>	<u>107</u>	<u>113</u>	<u>116</u>	<u>123</u>
<u>Relative Performance per Share</u>	<u>4</u>	<u>-2</u>	<u>-3</u>	<u>2</u>	<u>-7</u>
<u>Benchmark Performance Adjusted High Water Mark</u>	<u>103</u>	<u>104</u>	<u>113</u>	<u>116</u>	<u>123</u>
<u>Relative Performance per Share<sup>4</sup></u>	<u>4</u>	<u>-2</u>	<u>-3</u>	<u>2</u>	<u>-7</u>
	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>
<u>Average Number of Shares in Issue<sup>5</sup></u>	<u>1</u>	<u>1</u>	<u>800</u>	<u>800</u>	<u>1</u>
	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>
<u>Performance Fee Rate</u>	<u>20%</u>	<u>20%</u>	<u>20%</u>	<u>20%</u>	<u>20%</u>
	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>	<u>=</u>
<u>Performance Fee Due</u>	<u>800</u>	<u>None</u>	<u>None</u>	<u>320</u>	<u>None</u>
<u>Appreciation in value / payment of performance fees</u>	<u>YES</u>	<u>NO</u>	<u>NO</u>	<u>YES</u>	<u>NO</u>

<sup>1</sup> During the first performance period, the applicable High Water Mark is the subscription price at the time of issue of that share class.

<sup>2</sup> After the 1st performance period the applicable High Water Mark is the highest NAV recorded at the time the performance fee was last crystallized.

<sup>3</sup> If the Fund was in performance in the prior year the applicable Benchmark Performance High Water Mark is the High Water Mark plus the current year Benchmark Performance; otherwise, it is the prior year Benchmark Performance Adjusted High Water Mark plus the current year Benchmark Performance.

<sup>4</sup> Relative Performance is the difference between the NAV per Share at the End of the Fiscal Year and the Max of the High Water Mark and the Benchmark Performance Adjusted High Water Mark.

<sup>5</sup> The average number of Shares in issue is reset annually.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

### Global Supplement dated 22 April 2024

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This Global Supplement contains a list of all existing Funds of Wellington Management Funds (Ireland) plc (the "Company") currently approved by the Central Bank of Ireland (the "Central Bank").

**This Global Supplement forms part of, may not be distributed unless accompanied by (and must be read in conjunction with, the prospectus of the Company dated 20 March 2024.**

The following are the existing Funds as at the date of this Global Supplement:

FIXED INCOME FUNDS	EQUITY FUNDS	MULTI-ASSET FUNDS
Wellington Blended Opportunistic Emerging Markets Debt Fund Wellington Emerging Local Debt Fund Wellington Emerging Local Debt Advanced Beta Fund Wellington Euro High Yield Bond Fund Wellington Global Bond Fund Wellington Global Credit Short Duration Fund Wellington Global Credit ESG Fund Wellington Global High Yield Bond Fund Wellington Global Impact Bond Fund Wellington Higher Quality Global High Yield Bond Fund Wellington Opportunistic Emerging Markets Debt Fund Wellington Opportunistic Fixed Income Fund Wellington Sterling Core Bond Plus Fund Wellington US\$ Core High Yield Bond Fund Wellington World Bond Fund	Wellington All-China Focus Equity Fund Wellington Durable Companies Fund Wellington Durable Enterprises Fund Wellington Emerging Markets Equity Fund Wellington Emerging Markets Opportunities Fund Wellington Emerging Market Development Fund Wellington Enduring Assets Fund Wellington FinTech Fund Wellington Focused European Equity Fund Wellington Global Health Care Equity Fund Wellington Global Impact Fund Wellington Global Perspectives Fund Wellington Global Property Fund Wellington Global Stewards Fund Wellington India Focus Equity Fund Wellington Strategic European Equity Fund Wellington US Dynamic Equity Fund	Wellington Sustainable Multi-Asset Total Return Income Fund

## APPENDIX VII

### Additional information for Investors in Switzerland

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Date: 30 May 2024

This supplement contains information specific to investors in Switzerland regarding Wellington Management Funds (Ireland) plc (the "Company")

**It forms part of and must be read in conjunction with the prospectus of the Company issued on 20 March 2024 (the "Prospectus").**

#### 1. Representative and paying agent in Switzerland

BNP PARIBAS, Paris, Zurich branch, Selnaustrasse 16, 8002 Zurich

#### 2. Location where the relevant documents may be obtained

The Prospectus, the Key Information Documents, the Articles of Association as well as the Company's annual and semi-annual reports may be obtained free of charge from the Representative in Switzerland.

#### 3. Publications

Publications concerning the Company are made in Switzerland on the recognised electronic platform [www.swissfunddata.ch](http://www.swissfunddata.ch).

Each time shares are issued or redeemed, the issue and the redemption prices or the net asset value together with a reference stating "excluding commissions" are published daily on the recognised electronic platform [www.swissfunddata.ch](http://www.swissfunddata.ch).

#### 4. Payment of retrocessions and rebates

The Company and its agent may pay retrocessions as remuneration for distribution activity in respect of fund shares in Switzerland. This remuneration may be deemed payment for the following services in particular:

- Promoting, marketing and distribution of the Company in Switzerland;
- Relationship building and maintenance with potential investors in accordance with local regulation.

Retrocessions are not deemed to be rebates even if they are ultimately passed on, in full or in part, to the investors. Disclosure of the receipt of retrocessions is based on the applicable provisions of FinSA.

In the case of distribution activity in Switzerland, the Investment Managers and its agents may, upon request, pay rebates directly to investors. The purpose of rebates is to reduce the fees or costs incurred by the investor in question. Rebates are permitted provided that

- They are paid from fees received by the Company and therefore do not represent an additional charge on the fund assets;
- They are granted on the basis of objective criteria;
- All investors who meet these objective criteria and demand rebates are also granted these within

the same timeframe and to the same extent.

The objective criteria for the granting of rebates by the Investment Managers are as follows:

- the volume subscribed by the investor or the total volume they hold in the collective investment scheme or, where applicable, in the product range of the promoter;
- the amount of the fees generated by the investor;
- the investment behaviour shown by the investor (e.g. expected investment period);
- the investor's willingness to provide support in the launch phase of a collective investment scheme.

At the request of the investor, the Investment Managers must disclose the amounts of such rebates free of charge.

#### **5. Place of performance and jurisdiction**

In respect of the Shares offered in Switzerland, the place of performance is the registered office of the Representative in Switzerland. The place of jurisdiction is at the registered office of the Representative in Switzerland or at the registered office or place of residence of the investor.

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Stewards Fund**

This Fund is subject to the disclosure requirements of Article 9 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Stewards Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Sustainable Objective

The Investment Manager will seek to invest in companies whose management teams and boards display exemplary 'stewardship'. The Investment Manager defines stewardship as how companies balance the interests of all stakeholders (e.g. customers, employees, communities and the supply chain) in the pursuit of profits and how they incorporate material environmental, social and governance ("ESG") risks and opportunities in their corporate strategy. The Investment Manager will manage the Fund to target net zero emissions by 2050 in alignment with the Paris Agreement by actively engaging with companies held in the Fund to commit to net zero science-based targets.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI All Country World Index (the "Index") and achieve the objectives, primarily through investment in equity securities issued by large-cap companies worldwide. The Fund uses an investment approach based on bottom-up fundamental research into companies that exhibit attractive and persistent returns on equity and stewardship excellence. The Investment Manager is biased to own companies already in a position of strength: with established competitive positions, identifiable business advantages, a history of continuous improvement and innovation, and inspiring leadership. To help evaluate the likelihood of continuing attractive returns, the Investment Manager places an emphasis on each company's stewardship, with the belief that proper care and nurturing of a corporation's valuable assets and intangibles is critical to a company's long term resilience. The Investment Manager uses its proprietary scorecard to evaluate both the return and stewardship pillars of the investment approach. The scorecard seeks to quantify otherwise qualitative critical stewardship attributes such as executive skill and alignment and the effectiveness of the board. The Investment Manager believes that if investee companies are to sustain their returns in the long term then they must display strong links between stewardship and return on capital over the long-term. Further, every investment candidate for the Fund must exhibit an explicit focus on all stakeholders.

In relation to the net zero commitment, the science based targets initiative provides a clearly-defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement – limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C. Specifically, the Investment Manager is committed to investing 65% of the Fund's assets (ex-cash and cash equivalents) in companies with net zero science-based targets by 2030, and 100% of the Fund (ex-cash and cash equivalents) by 2040. In the interim, the Investment Manager is committed to investing 100% of the Fund's assets (ex-cash and cash equivalents) in companies that have at least one of the following three attributes: a net zero science-based target, a non- science-based target which is a public active emissions reduction target, or a combined scope 1+2 intensity (tons CO2/\$M revenue) that is at least 25% below their industry average based on publicly disclosed emissions.

In addition to the above, the Fund has adopted the following binding restrictions that are consistent with its sustainable objective and which also support certain environmental or social characteristics in the following ways:

The Fund will not invest in any companies identified as failing to comply with the United Nations Global Compact.

The Fund will not invest in securities of any company identified as involved in the manufacturing or selling of weapons.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)
- Scarcity of natural resources & biodiversity
- Pollution & waste

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Lack of diversity at board or governing body level
- Corporate management practices
  - i. Inadequate external or internal audit
- The absence of appropriate and effective safeguards for employment related risks
  - i. Workplace accident prevention policy

Further details on the Sustainability Risks considered and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Fund is expected to be well diversified by country, currency and industry but may hold positions that are concentrated in this manner from time to time. The Fund is also expected to be concentrated in a relatively small number of securities and turnover is expected to be low.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is market capitalisation weighted and designed to measure the equity market performance of developed and emerging markets. The Index does not take into account the environmental and social characteristics referenced above.



The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Funds use of derivatives will be for the purpose of hedging in accordance with the purposes set out below.

1. For the purpose of realizing the same amount of profit or loss of assets that are the investment targets of the Fund; or
2. For the purpose of minimizing risks (the increase or decrease of profits and losses due to factors such as foreign exchange rate fluctuations, interest rate fluctuations, and changes in economic conditions) arising from price fluctuations and interest rate fluctuations pertaining to the assets or liabilities of the Fund; or
3. For the purpose of minimizing risks arising from foreign exchange rate fluctuations for the assets or liabilities of the Fund through foreign exchange futures trades.

The Fund may invest in developed countries and up to 20% of its Net Asset Value in countries which are considered by the Investment Manager to be emerging markets. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make a limited investment in securities traded on Russian markets and may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising the market access products mentioned above as well as index futures and currency forward contracts to gain exposure to the instruments listed above in pursuit of the investment objectives and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally less than 5% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**, subject to a maximum 10% of Net Asset Value of the Fund.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing day means a Business Day;

A list outlining the expected Non- Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed Risk Factors in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objectives. The principal risks, which are described in the Risk Factors section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Market

- Operational Risk
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S, US	USD 1 million	USD 1,000
T	USD 5 million	
E, EN	USD 10 million	
D, N, DL, UD and UN	USD 5,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. With the exception of US Share Classes, each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class. US, UD, and UN Share Classes in each Dealing Currency including the Base Currency are available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time. With the exception of US Share Classes, Hedged Share Classes will involve hedging the Dealing Currency against the Base Currency of the Fund. For US Share Classes, Hedged Share Classes will involve hedging the Dealing Currency against other currencies in which the assets of the Fund are denominated (based on actual exposures).

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class E** Shares are available to certain investors until the total Net Asset Value of the Fund reaches USD250m or equivalent amount in another currency.

**Class EN** Shares are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S or E Shares. EN Shares are available until the total Net Asset Value of the Fund reaches USD250m or equivalent amount in another currency. No distribution fee is paid in respect of the Class EN Shares.

**Class US, UN and UD** Shares are reserved exclusively for a financial intermediary, approved by the Company, acting on behalf of underlying beneficial holders. Class US Shares are available for underlying beneficial holders that are Institutional Investors. Class UN Shares are available for underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class US Shares. No distribution fee is paid in respect of the Class UN Shares. Class UD Shares are available for underlying beneficial holders in respect of whom a distribution fee attributable to the Class UD Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.40%	N/A
T	N/A		N/A	N/A
D	5%		0.40%	0.50%
N	N/A		0.40%	N/A
DL	3%		0.40%	1.65%
E	N/A		0.30%	N/A
EN	N/A		0.30%	N/A
US	N/A		Up to 0.40%	N/A
UD	5%		Up to 0.40%	0.50%
UN	N/A		Up to 0.40%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, DL, E, EN, UN and UD where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Global Stewards Fund

**Legal entity identifier:**  
5493008OEV43ON7WJZ02

### Sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 20%</b></p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 10%</b></p>	<p><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with a social objective</p> <p><input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What is the sustainable investment objective of this financial product?

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

The Investment Manager will seek to invest in companies whose management teams and boards display exemplary 'stewardship'. The Investment Manager defines stewardship as how companies balance the interests of all stakeholders (e.g. customers, employees, communities and the supply chain) in the pursuit of profits and how they incorporate material environmental, social and governance ("ESG") risks and opportunities in their corporate strategy.

The Investment Manager will invest in companies that are assessed to contribute to one or more of the following environmental and social stewardship criteria which are aligned with the sustainable objective of the Fund.

Social criteria such as:

- responsible sourcing and production practices;
- consumer privacy and cybersecurity;
- sustainable investment in technology, innovation, and human capital.

Environmental criteria such as:

- sustainable product design and resilient infrastructure;
- responsible waste / end of product life cycle;
- supply chain engagement.

As described in the paragraph above, each of the themes includes either predominantly environmental or predominantly social stewardship criteria. However, each environmental and social stewardship criteria may have both environmental and social benefits.

The Investment Manager uses its proprietary scorecard to evaluate both the return and stewardship pillars of the investment approach. The scorecard will quantify otherwise qualitative critical stewardship attributes



such as executive skill and alignment and the effectiveness of the board. The Investment Manager anticipates the scorecard framework to evolve over time given ESG/stewardship issues are not static. The Investment Manager believes that if a company prioritizes stewardship in running its business, it will increase the ability of the company to sustain high returns over the long term. Further, every investment candidate for the Fund must exhibit an explicit focus on all stakeholders by evidencing factors such as their accountability of supply chain, focus on water usage intensity or running the business with a long term orientation.

The Fund expects to maintain a minimum of 90% of its net assets in companies which meet the above criteria and which are assessed to be Sustainable Investments. Sustainable Investments may contribute to either environmental or social objectives. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 20% in Sustainable Investments with an environmental objective and at least 10% in Sustainable Investments with a social objective.

Although the Fund does not have a reduction in carbon emissions as its objective pursuant to Article 9(3) of SFDR, the Fund targets net zero emissions by 2050 in alignment with the Paris Agreement by investing in companies that have set carbon emission reduction targets or maintain lower carbon emissions relative to their industry average.

In relation to the net zero commitment, the science-based targets initiative ("SBTi") provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement - limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

A reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

*What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?*

The percentage of the Fund's net assets in companies that are considered Sustainable Investments and contribute to one or more of the Funds stewardship criteria.

The percentage of the Fund's net assets invested in companies with established or which have committed to establish a science-based target.

The percentage of the Fund's net assets invested in companies with an alternative public active emissions reduction target.

The percentage of the Fund's net assets invested in companies with combined scope 1 and 2 carbon intensity (tons CO2/\$M revenue) that is at least 25% below their industry average based on publicly disclosed emissions.

*How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?*

Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign Principal Adverse Impacts, as appropriate for the asset type, and as listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs").

PAIs are assessed quantitatively, according to third party data, or qualitatively by the Investment Manager's research analysts and investment teams using internal research and analysis regarding issuer activities.

Where PAI data is lacking or unavailable, and as applicable to the asset type, the Investment Manager will conduct further due diligence and qualitatively assess the issuer's activities, processes or policies related to climate, environmental, social and/or anti-bribery/anti-corruption matters to determine that the issuer is not doing significant harm.

**PAI Criteria**

Where the PAIs reflect a quantitative data point and such quantitative data is available, each Sustainable Investment is compared against quantitative thresholds set by the Investment Manager as applicable to the asset type. The thresholds may be determined by setting express conditions or fixed numerical thresholds for a given PAI. For example, companies which produce controversial weapons are excluded in accordance with the Exclusions Policy, while the greenhouse gas emissions PAI threshold is applied to issuers included within the Climate Action 100+ list as the largest corporate greenhouse gas emitters. The Climate Action 100+ list is comprised of corporate issuers representing approximately 80% of global corporate GHG emissions. Companies on the Climate Action 100+ list which have reported against TCFD standards and have stated interim and long-term decarbonization / net zero goals are not deemed to be doing significant harm.

Certain PAIs are evaluated relative to industry peers and the worst companies in those industries will set the standard for determining significant harm. Where the Investment Manager has determined that industry differentiation is less meaningful, thresholds will be set in the context of all issuers. As an example, the carbon footprint and greenhouse gas intensity of investee companies PAI's are evaluated relative to industry peers, and the threshold is reached where companies are determined to be among the highest within any of the MSCI-defined Global Industry Classification Standard (GICS) Level 3 industries with respect to greenhouse gas intensity or carbon footprint.

Where the Investment Manager has determined that differentiation is less meaningful or for PAIs which are more qualitative in nature (e.g. PAIs relating to the UNGC principles and the OECD Guidelines) significant harm is assessed by evaluating, among others, companies' activities, management policies and practices or unresolved controversies using third party data. For some indicators (e.g. board gender diversity and gender pay gap evaluation), the Investment Manager looks at third party data regarding, among others, discrimination and workforce diversity controversies along with evaluation of the presence of women in the decision-making bodies of the company.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Investment Manager uses PAI data in its investment research tools, portfolio management tools and trading compliance system. Issuers who fail to pass the Investment Manager’s criteria may not be held in portfolios and designated as Sustainable Investments. Assessment against the PAIs for the purpose of ensuring that Sustainable Investments do not significantly harm environmental or social objectives includes the following:

- Exclusions with respect to the production of controversial weapons, revenues associated with thermal coal extraction or power generation and revenues associated with the production and generation of oil sands are applied in accordance with the Exclusions Policy in order to avoid significant activities associated with controversial weapons and fossil fuels PAIs.
- The Investment Manager uses third party data to understand the negative impact an issuer may have on a given PAI and sets pre-defined thresholds within each PAI which are applied on a pre-trade basis as applicable for the asset class. Where third party data indicates that an issuer is potentially doing significant harm according to the PAI threshold, the Investment Manager conducts additional due diligence using a variety of internal research and external data to determine whether the data is accurate.
- Where third party data is unavailable regarding a specific PAI, the Investment Manager conducts additional due diligence using a variety of internal research and external data (including by looking at public disclosures or reporting or via outreach directly to the issuer itself) to assess that the issuer is not doing significant harm.
- Where third party data indicates that the thresholds set for one or more PAIs have been reached and such data is found to be correct, the Investment Manager may further evaluate and engage with the issuer to ensure the issuer is aware of the harm or identified controversy and is taking active steps to mitigate or remediate such harm including with respect to transitioning away from potentially harmful activities. Where PAI data may not be relevant to investments in specific issuer projects such as use-of-proceeds bonds, the Investment Manager may also further evaluate the specific nature of such projects or activities in order to confirm that such activities are not being carried out in a way that causes significant harm.
- Where an issuer is confirmed to have reached a relevant PAI threshold and is not engaging with the Investment Manager to address it, the Investment Manager will not invest in such an issuer or will seek to divest in the best interests of Fund investors.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested as part of the Investment Manager’s process to identify Sustainable Investments. Assessment of management policies and practices are necessary to determine alignment. Misalignment with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights may be determined where the Investment Manager identifies UN Global Compact non-compliance, inadequate policies and/or unresolved controversies.

Issuers assessed to be in breach of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of human Right are not eligible to be classified as Sustainable Investments.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

The Fund's Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign PAIs to determine that the Sustainable Investments do not cause significant harm to any environmental or social sustainable objective. In addition, by virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the PAIs into consideration either directly or indirectly on all or a portion of the Fund as follows:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will invest in companies that have a target validated by SBTi, an alternative public active emissions reduction target or a combined Scope 1+2 carbon intensity (tons CO2/\$M revenue) that is at least 25% below their industry average based on publicly disclosed emissions - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the Fund's Sustainable Investment Objective is described below.

The Investment Manager will actively manage the Fund, seeking to outperform the Index and achieve the objectives, primarily through investment in equity securities issued by large-cap companies worldwide. The Fund uses an investment approach based on bottom-up fundamental research into companies that exhibit attractive and persistent returns on equity and stewardship excellence. The Investment Manager is biased to own companies already in a position of strength, with established competitive positions, identifiable business advantages, a history of continuous improvement and innovation and inspiring leadership. To help evaluate the likelihood of continuing attractive returns, the Investment Manager places an emphasis on each company's stewardship, with the belief that proper care and nurturing of a company's valuable assets and intangibles is critical to the business's long-term resilience.

The Investment Manager uses its proprietary scorecard to evaluate both the return and stewardship pillars of the investment approach. The scorecard will quantify otherwise qualitative critical stewardship attributes such as executive skill and alignment and the effectiveness of the board. The Investment Manager believes that if investee companies are to sustain their returns in the long term then they must display strong links between stewardship and return on capital over the long-term. Further, every investment candidate for the Fund must exhibit an explicit focus on all stakeholders.

The Investment Manager evaluates companies prior to investment to identify whether they have a target validated by SBTi, an alternative public active emissions reduction target or combined Scope 1+2 carbon intensity (tons CO<sub>2</sub>/\$M revenue) relative to their industry average.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?*

The Investment Manager will only invest in securities that are considered Sustainable Investments and materially align with at least one of the stewardship aims.

The Investment Manager is committed to investing 65% of the Fund's net assets (excluding cash and cash equivalents) in companies with net zero science-based targets by 2030, and 100% of the Fund's net assets (excluding cash and cash equivalents) by 2040.

The Investment Manager will invest 100% of its net assets (excluding cash and cash equivalents) in companies that have at least one of the following three attributes: a target validated by SBTi, an alternative public active emissions reduction target or a combined Scope 1+2 carbon intensity (tons CO<sub>2</sub>/\$M revenue) that is at least 25% below their industry average based on publicly disclosed emissions.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

### What is the policy to assess good governance practices of the investee companies?

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.



### What is the asset allocation and the minimum share of sustainable investments?

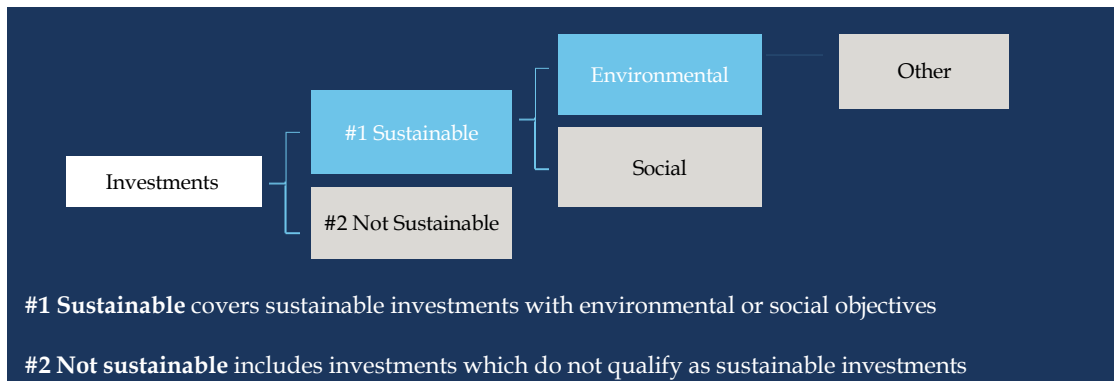
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, the Fund will have a minimum of 90% of its net assets aligned with the #1 Sustainable category, as defined in the diagram below, with the proportion of Sustainable Investments with environmental versus social objectives varying based on the Fund's composition. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 20% in Sustainable Investments with an environmental objective and at least 10% in Sustainable Investments with a social objective.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social objective may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social objective.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



### How does the use of derivatives attain the sustainable investment objective?

The Investment Manager may use derivatives in order to gain exposure to securities of companies whose management teams and boards display exemplary 'stewardship'.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Although the Fund commits to invest in Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of EU Taxonomy-aligned investments is 0%.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

- Yes
- In fossil gas       In nuclear energy
- No

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Although the Fund commits to make Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of such investments with an environmental objective not EU Taxonomy-aligned is 20%.

These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.



### What is the minimum share of sustainable investments with a social objective?

Minimum 10% of the Fund's net assets invested in socially sustainable investments.



### What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The investments under '#2 Not sustainable' may include cash and cash equivalents for liquidity purposes, and derivatives for EPM and hedging purposes.

There are no minimum environmental or social safeguards applied to investments made under '#2 Not sustainable'.



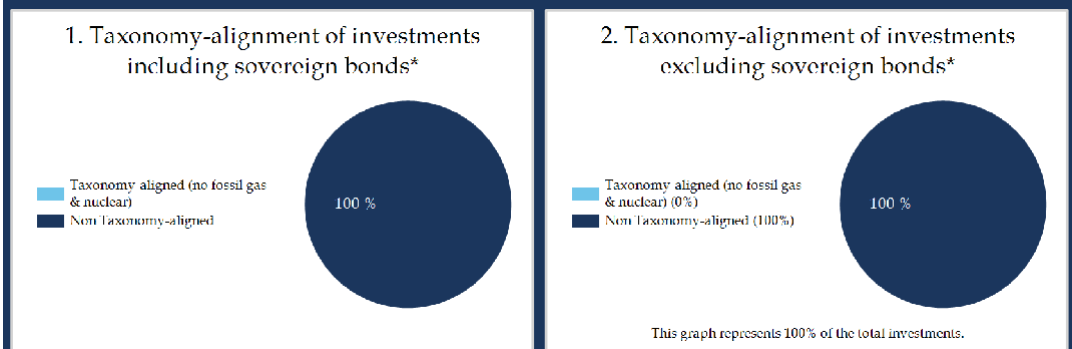
### Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

*How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?*

Not applicable.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

### What is the minimum share of investments in transitional and enabling activities?

Although the Fund commits to invest in Sustainable Investments within the meaning of the SFDR, the minimum share of investments in transitional and enabling activities is 0%.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.



*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



#### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F001168\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001168)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Impact Bond Fund**

The Fund is subject to the disclosure requirements of Article 9 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Impact Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Sustainable Objective

The Investment Manager will seek to understand the world's social and environmental challenges and to identify and invest in debt issued by companies and organizations that it believes addresses these challenges in a differentiated way through their products, services and projects. Through the Fund's investments, the Investment Manager seeks to improve access to, and quality of, basic life essentials, reduce inequality, and mitigate the effects of climate change.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the Bloomberg Global Aggregate Hedged to US dollar Index (the "Index") and achieve the objectives primarily through investment in investment grade rated global fixed income securities issued by organisations whose core business or projects, in the opinion of the Investment Manager, address some of the world's major social and environmental challenges.

The Investment Manager seeks to identify securities which it believes fall into three primary impact categories: life essentials, human empowerment and the environment. Within these categories the Fund will invest across "Impact Themes" including, but not limited to the following:

- Life Essentials: affordable housing, clean water and sanitation, health, sustainable agriculture and nutrition.
- Human Empowerment: digital divide, education and job training, financial inclusion, safety and security.
- Environment: alternative energy, resource efficiency and resource stewardship

The Investment Manager aims to select securities which the Investment Manager believes will offer an attractive return profile over the long term, for example, issuers whose core products, services and projects align with any one or a combination of different Impact Themes, whose social and/or environmental impact is quantifiable and where fundamental analysis supports a long-term return. The Fund may have greater exposures to some Impact Themes than others. This is because there can be more impact investment opportunities within certain Impact Themes like affordable housing, health and resource efficiency.

The Investment Manager relies on a bottom-up process for identifying and analyzing candidate issuers for investment. In defining the opportunity set, the Investment Manager takes into account both quantitative and qualitative considerations to fulfil each of the three impact criteria:

1. **Materiality:** Impact activity must be central to the issuer. In the case of use-of-proceeds bonds, proceeds must be used for an activity that the Investment Manager deems to be related to one of its Impact Themes.
2. **Additionality:** The Investment Manager evaluates each issuer's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.

3. **Measurable key performance indicators (KPIs):** The impact case must be quantifiable. The Investment Manager uses issuer reports and proprietary models to develop individualized KPIs to understand the nature of the impact generated by the issuer, its alignment with the Fund's Impact Themes, and progress over time.

After an issuer or issue meets the above impact criteria, only those that the Investment Manager believes have the most attractive risk/return profile and diversification properties are selected for inclusion in the portfolio. Specifically, the portfolio construction process combines a top-down sector strategy with bottom-up fundamental credit research. The top-down aspects of the Investment Manager's process include setting desired risk levels, including credit risk and duration positioning, and determining sector-relative value.

In addition, the Investment Manager will also seek to reduce the carbon footprint of the Fund's corporate holdings as measured by their total weighted average carbon intensity (**WACI**) to net zero by 2050, or sooner, in line with the Paris Agreement. The Investment Manager considers the carbon intensity and future decarbonization plans of individual corporate issuers at the time of investment. The Investment Manager also conducts ongoing monitoring of corporate issuer-level decarbonization and the overall WACI of the Fund's corporate exposure and, may reduce or eliminate exposures to certain corporate issuers that fail to demonstrate improving carbon reduction trajectories, or increase the allocation of corporate issuers that demonstrate improving carbon reduction trajectories, and also align to the Investment Manager's valuation criteria. The Investment Manager will manage the Fund towards this 2050 net zero commitment by reducing the WACI figure of the Fund's corporate holdings by no less than 50% below the Index's 2019 baseline WACI by 2030 and aims to achieve net zero by 2050. As an interim milestone, the Investment Manager is committed to limit the Fund's contribution to climate change by targeting a total WACI of corporate holdings that is at least 30% less than the Index's 2019 WACI baseline as it transitions towards its 2030 and 2050 carbon reduction goals as specified above. Carbon emissions data will typically be available for approximately 80% of the Fund's corporate holdings, although this figure may vary over time depending on issuance in the market.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)
- Scarcity of natural resources & biodiversity
- Pollution & waste

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Lack of diversity at board or governing body level

- Corporate management practices
  - i. Inadequate external or internal audit
- The absence of appropriate and effective safeguards for employment related risks
  - i. Workplace accident prevention policy

Further details on the Sustainability Risks considered and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index will be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how overall interest rate duration differs from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index is comprised of fixed income securities from a broad array of geographies and sectors with a maturity of over one year on a currency hedged basis. The Index does not take into account the environmental, governance and social characteristics referenced above.

The Fund may invest, either directly or indirectly through the use of FDIs, in a diversified portfolio of global fixed income securities issued by corporate, government, agency, quasi-sovereign and supranational issuers; mortgage, commercial mortgage, and asset-backed securities; hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**; corporate and real estate investment trust debt; sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations) and, in addition, bank loan assignments that qualify as Money Market Instruments; as well as other debt securities issued by public or private issuers, both fixed and floating-rate, including forward contracts on such securities. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)). The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

These fixed income securities may be denominated in US Dollars or other currencies. The Fund may hold cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents** in multiple currencies without restriction. The Fund is denominated in US Dollars. Non-US Dollar exposures within the Fund will generally be hedged back to US Dollars.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising interest rate and bond futures, interest rate, bond options and options on futures, swaptions, interest rate, currency and total return swaps, credit default swaps, index credit default swaps, bond and currency forwards, forward rate agreements, warrants and "to-be-announced" securities to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 50% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

The Fund generally will be diversified by sector, country and issuer, but may hold positions that are concentrated from time to time. The Fund will invest primarily in developed markets; however, the Fund may also invest in any country which is considered by the Investment Manager to be an emerging market. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**). The Fund's weighted average credit quality is expected to be investment grade, but below investment grade rated securities may be purchased up to 20% of the Net Asset Value of the Fund. The Fund will invest in global fixed income securities of varying maturity but will generally have interest rate duration of +/-1.5 years of the Index.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as absolute VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed 20% of the Fund's Net Asset Value for a holding period equivalent to one month. The Fund adopts a one-tailed 99% confidence level under normal market conditions for a one month holding horizon and considering at least one year of historical data. Further information on the risk management method can be found in the Prospectus in the section entitled Financial Derivative Instruments (FDIs).

It is expected that the Fund will generally incur leverage at a rate of between 0% and 650% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. If the expected level of leverage calculated taking into account netting of equal and opposite foreign exchange forward contracts and excluding the share class hedging, the level of leverage would be expected to be lower and generally between 0% and 150% of the Fund's Net Asset Value. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

**German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

**GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing/Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com/>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com.

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objectives. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Market
- Operational Risk
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing



Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.30%	N/A
T	N/A		N/A	N/A
D	5%		0.30%	0.30%
N	N/A		0.30%	N/A
DL	3%		0.30%	1.10%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes D, N and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in  
Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and  
Article 5, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Global Impact Bond Fund**

**Legal entity identifier:**  
**549300O3JXJYDUHRO528**

**Sustainable investment objective**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: 10%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: 20%</p>	<p><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of__% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What is the sustainable investment objective of this financial product?**

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

The Investment Manager will seek to invest in debt issued by companies and organizations that it believes address specific social and environmental challenges in a differentiated way through their core products and services. The Investment Manager will make investments in issuers and issuances that have the potential to improve access to, and quality of, basic life essentials, reduce inequality, and mitigate the effects of climate change.

Within these categories, the Fund will aim to diversify across impact themes including, but not limited to, the following:

- **Life Essentials:** addresses social objectives such as increasing access to affordable housing and improving access and outcomes related to health. Life essentials also addresses social and environmental objectives through increasing access to clean water & sanitation and sustainable agriculture & nutrition.
- **Human Empowerment:** addresses social objectives such as bridging the digital divide, increasing access to education and job training, expanding financial inclusion, and increasing safety and security.
- **Environment:** addresses environmental objectives such as combatting climate change through the development and promotion of alternative energy and resource efficiency, while also considering resource stewardship.

The Investment Manager aims to select securities where fundamental analysis supports the approach's long-term return objective, and whose core products, services and/or projects align with any one or a combination of different Impact Themes in a way that is quantifiable. The Fund may have greater exposures to some Impact Themes than others. This is because there can be more impact investment opportunities within certain Impact Themes like affordable housing, health, and resource efficiency.

The Investment Manager relies on a bottom-up process for identifying and analyzing candidate issuers for investment. In defining the opportunity set, the Investment Manager takes into account both quantitative and

qualitative considerations to fulfill each of the three impact criteria:

1. Materiality: Impact activity must be central to the issuer. In the case of use-of-proceeds bonds, proceeds must be used for an activity that the Investment Manager deems to be related to one of its Impact Themes.
2. Additionality: The Investment Manager evaluates each issuer's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.
3. Measurable key performance indicators (KPIs): The impact case must be quantifiable. The Investment Manager uses issuer reports and proprietary models to develop individualized KPIs to understand the nature of the impact generated by the issuer, its alignment with the Fund's Impact Themes, and progress over time.

The Fund typically expects to invest a minimum of 85% of its net assets in issuers which meet the above criteria and are assessed to be Sustainable Investments. Sustainable Investments may contribute to either environmental or social objectives. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 10% in Sustainable Investments with an environmental objective and at least 20% in Sustainable Investments with a social objective.

Although the Fund does not have a reduction in carbon emissions as its objective pursuant to Article 9(3) of SFDR, the Fund targets net zero emissions for its corporate holdings by 2050 in alignment with the Paris Agreement. The Investment Manager monitors the WACI of the Fund's corporate holdings compared to the 2019 WACI baseline of the Index and adjusts it over time in order to target net zero emissions by 2050, or sooner.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

The percentage of the Fund's net assets in companies that are considered Sustainable Investments and contribute to the Funds impact categories of life essentials, human empowerment, and the environment. The Fund will invest at least 85% of net assets in issuers that meet these criteria.

The percentage difference of the WACI of the Fund's corporate holdings and that of the Index's 2019 WACI baseline. Since the Fund maintains a WACI of its corporate holdings that is 30% below the Index's 2019 WACI baseline, with this percentage increasing to 50% by 2030, this percentage is expected to be at least 30% and to increase to at least 50% by 2030.

*How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?*

Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign Principal Adverse Impacts, as appropriate for the asset type, and as listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs").

PAIs are assessed quantitatively, according to third party data, or qualitatively by the Investment Manager's research analysts and investment teams using internal research and analysis regarding issuer activities.

Where PAI data is lacking or unavailable, and as applicable to the asset type, the Investment Manager will conduct further due diligence and qualitatively assess the issuer's activities, processes or policies related to climate, environmental, social and/or anti-bribery/anti-corruption matters to determine that the issuer is not doing significant harm.

**PAI Criteria**

Where the PAIs reflect a quantitative data point and such quantitative data is available, each Sustainable Investment is compared against quantitative thresholds set by the Investment Manager as applicable to the asset type. The thresholds may be determined by setting express conditions or fixed numerical thresholds for a given PAI. For example, companies which produce controversial weapons are excluded in accordance with the Exclusions Policy, while the greenhouse gas emissions PAI threshold is applied to issuers included within the Climate Action 100+ list as the largest corporate greenhouse gas emitters. The Climate Action 100+ list is comprised of corporate issuers representing approximately 80% of global corporate GHG emissions. Companies on the Climate Action 100+ list which have reported against TCFD standards and have stated interim and long-term decarbonization / net zero goals are not deemed to be doing significant harm.

Certain PAIs are evaluated relative to industry peers and the worst companies in those industries will set the standard for determining significant harm. Where the Investment Manager has determined that industry differentiation is less meaningful, thresholds will be set in the context of all issuers. As an example, the carbon footprint and greenhouse gas intensity of investee companies PAI's are evaluated relative to industry peers, and the threshold is reached where companies are determined to be among the highest within any of the MSCI-defined Global Industry Classification Standard (GICS) Level 3 industries with respect to greenhouse gas intensity or carbon footprint.

Where the Investment Manager has determined that differentiation is less meaningful or for PAIs which are more qualitative in nature (e.g. PAIs relating to the UNGC principles and the OECD Guidelines) significant harm is assessed by evaluating, among other aspects, companies' activities, management policies and practices or unresolved controversies using third party data. For some indicators (e.g. board gender diversity and gender pay gap evaluation), the Investment Manager looks at third party data regarding, among other factors, discrimination and workforce diversity controversies along with evaluation of the presence of women in the decision-making bodies of the company.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Investment Manager uses PAI data in its investment research tools, portfolio management tools and trading compliance system. Issuers who fail to pass the Investment Manager's criteria may not be held in portfolios and designated as Sustainable Investments. Assessment against the PAIs for the purpose of ensuring that Sustainable Investments do not significantly harm environmental or social objectives includes the following:

- Exclusions with respect to the production of controversial weapons, revenues associated with thermal coal extraction or power generation and revenues associated with the production and generation of oil sands are applied in accordance with the Exclusions Policy in order to avoid significant activities associated with controversial weapons and fossil fuels PAIs.
- The Investment Manager uses third party data to understand the negative impact an issuer may have on a given PAI and sets pre-defined thresholds within each PAI which are applied on a pre-trade basis as applicable for the asset class. Where third party data indicates that an issuer is potentially doing significant harm according to the PAI threshold, the Investment Manager conducts additional due diligence using a variety of internal research and external data to determine whether the data is accurate.
- Where third party data is unavailable regarding a specific PAI, the Investment Manager conducts additional due diligence using a variety of internal research and external data (including by looking at public disclosures or reporting or via outreach directly to the issuer itself) to assess that the issuer is not doing significant harm.
- Where third party data indicates that the thresholds set for one or more PAIs have been reached and such data is found to be correct, the Investment Manager may further evaluate and engage with the issuer to ensure the issuer is aware of the harm or identified controversy and is taking active steps to mitigate or remediate such harm including with respect to transitioning away from potentially harmful activities. Where PAI data may not be relevant to investments in specific issuer projects such as use-of-proceeds bonds, the Investment Manager may also further evaluate the specific nature of such projects or activities in order to confirm that such activities are not being carried out in a way that causes significant harm.
- Where an issuer is confirmed to have reached a relevant PAI threshold and is not engaging with the Investment Manager to address it, the Investment Manager will not invest in such an issuer or will seek to divest in the best interests of Fund investors.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested as part of the Investment Manager's process to identify Sustainable Investments. Assessment of management policies and practices are necessary to determine alignment. Misalignment with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights may be determined where the Investment Manager identifies UN Global Compact non-compliance, inadequate policies and/or unresolved controversies.

Issuers assessed to be in breach of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of human Right are not eligible to be classified as Sustainable Investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

The Fund's Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign PAIs to determine that the Sustainable Investments do not cause significant harm to any environmental or social sustainable objective. In addition, by virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the PAIs into consideration either directly or indirectly on all or a portion of the Fund as follows:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will maintain a carbon footprint (as measured by their total WACI) that is lower than the Index. The Fund will aim to reduce the (WACI) of its corporate holdings to net zero by 2050, or sooner, in accordance with the Paris Agreement - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy , and also includes oil - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr) .





## What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the Fund's Sustainable Investment Objective is described below.

The Investment Manager will seek to identify the universe of these issuers based on three primary impact categories: life essentials, human empowerment and the environment. Within these categories, the Fund will aim to diversify across impact themes including, but not limited to, the following:

- Life essentials – affordable housing; clean water and sanitation; health; and sustainable agriculture and nutrition
- Human empowerment – digital divide; education and job training; financial inclusion; and safety and security
- Environment – alternative energy; resource efficiency; and resource stewardship

The Investment Manager aims to select securities which the Investment Manager believes will offer an attractive return profile over the long term, for example, issuers whose core products, services and projects align with any one or a combination of different Impact Themes, whose social and/or environmental impact is quantifiable and where fundamental analysis supports a long-term return. The Fund may have greater exposures to some Impact Themes than others. This is because there can be more impact investment opportunities within certain Impact Themes like affordable housing, health and resource efficiency.

The Investment Manager relies on a bottom-up process for identifying and analyzing candidate issuers for investment. In defining the opportunity set, the Investment Manager takes into account both quantitative and qualitative considerations to fulfil each of the three impact criteria:

1. Materiality: Impact activity must be central to the issuer, measured in a way that the Investment Manager believes is most relevant to assessing Materiality for that kind of issuer. In the case of use-of-proceeds bonds, proceeds must be used for an activity that the Investment Manager deems to be related to one of its Impact Themes.
2. Additionality: The Investment Manager evaluates each issuer's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.
3. Measurable key performance indicators (KPIs): The impact case must be quantifiable. The Investment Manager uses issuer reports and proprietary models to develop individualized KPIs to understand the nature of the impact generated by the issuer.

After an issuer or issue meets the above impact criteria, only those that the Investment Manager believes have the attractive risk/return profile and diversification properties consistent with the Fund's financial performance objectives are selected for inclusion in the portfolio. Specifically, the portfolio construction process combines a top-down sector strategy with bottom-up fundamental credit research. The top-down aspects of the Investment Manager's process include setting desired risk levels, including credit risk and duration positioning, and determining sector-relative value.

The Investment Manager believes identifying investment opportunities which generate a positive impact requires bottom-up fundamental research. However, the Fund also uses screening to ensure certain investments are excluded, in addition to the Exclusion Policy, further details of which can be found in the section of the Prospectus entitled Exclusions. These include issuers principally involved in the following industries: tobacco, firearms, defense, nuclear, coal, oil, adult entertainment, gambling and alcohol as these are issuers the Investment Manager believes run counter to, or undermine, the Fund's sustainable investment objective. In select instances, the Investment Manager may invest in use-of-proceeds bonds within the energy and utilities industries, where proceeds are being allocated to specific projects that meet the Investment Manager's Impact criteria.

In addition, the Investment Manager monitors the WACI of the Fund's corporate holdings compared to the 2019 WACI baseline of the Index and adjusts it over time in order to target net zero emissions by 2050 in alignment with the Paris Agreement.

*What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?*

The Investment Manager will only invest in bond issues that are considered Sustainable Investments which materially align with at least one of the impact themes which fall into three primary impact categories of life essentials, human empowerment, and the environment.

When assessing the “Materiality” impact criterion as described above, the Investment Manager will apply a pre-defined Materiality threshold to a metric that it believes is most relevant for assessing Materiality for a given issuer. These metrics could include, but are not limited to:

- For general purpose corporate bonds: percent of revenue aligning with a given Impact theme
- For Agency MBS: percent of the issuance’s collateral comprised of affordable housing units based on residents’ income relative to their Area Median Income (“AMI”)
- For CMBS: percent of the issuance’s collateral comprised of LEED Gold+ Certified units
- For supranationals: percent of budget aligned with our proprietary Impact themes, as described above

These criteria may not apply in the instances where the Investment Manager may invest in use-of-proceeds bonds, which align with the Fund's impact criteria and one or more impact theme.

This assessment will be undertaken prior to purchase, and thereafter the Investment Manager will endeavor to refresh this assessment on an annual basis for as long as the security is held. If, upon the annual review, it is found that an issuer is no longer meeting the relevant materiality threshold, the Investment Manager will engage with the issuer to understand the drivers of the change. If the Investment Manager determines that the shift appears temporary (e.g., caused by external factors which the issuer cannot control, and which the Investment Managers believes the issuer would expect to resolve within the next 12 months), then the issuer may remain in the Fund.

In relation to the net zero commitment, the Fund will invest in corporate holdings that have a collective WACI that is no less than 50% below the Index’s 2019 WACI by 2030 and aim to achieve net zero by 2050. As an interim milestone until 2030, the Investment Manager is committed to limit the Fund’s contribution to climate change by targeting its corporate holdings to collectively have a WACI that is at least 30% less than the Index’s 2019 WACI baseline as it transitions towards its 2030 and 2050 carbon reduction goals as specified above.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.



## What is the asset allocation and the minimum share of sustainable investments?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, the Fund will have a minimum of 85% of its net assets aligned with the #1 Sustainable category, as defined in the diagram below, with the proportion of Sustainable Investments with environmental versus social objectives varying based on the Fund's composition. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 10% in Sustainable Investments with an environmental objective and at least 20% in Sustainable Investments with a social objective.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social objective may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social objective.

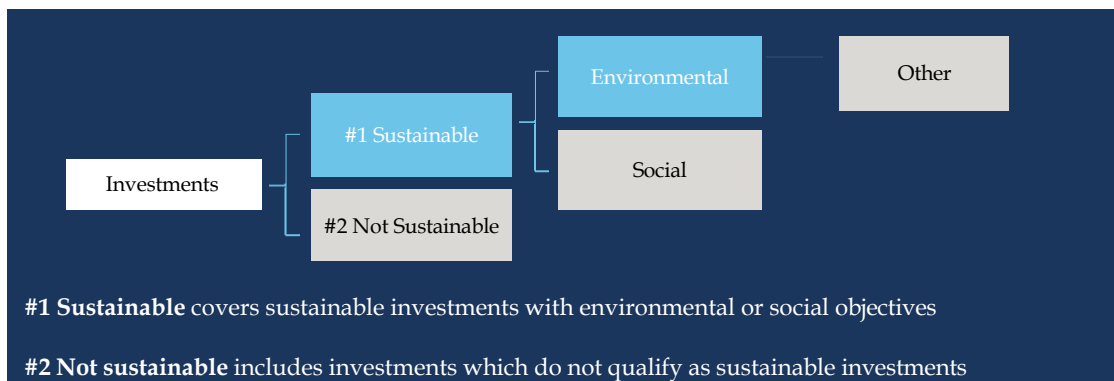
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



### How does the use of derivatives attain the sustainable investment objective?

Derivatives are used by the Fund to a limited extent for the purpose of attaining the sustainable investment objective of the Fund and for efficient portfolio management.



### To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

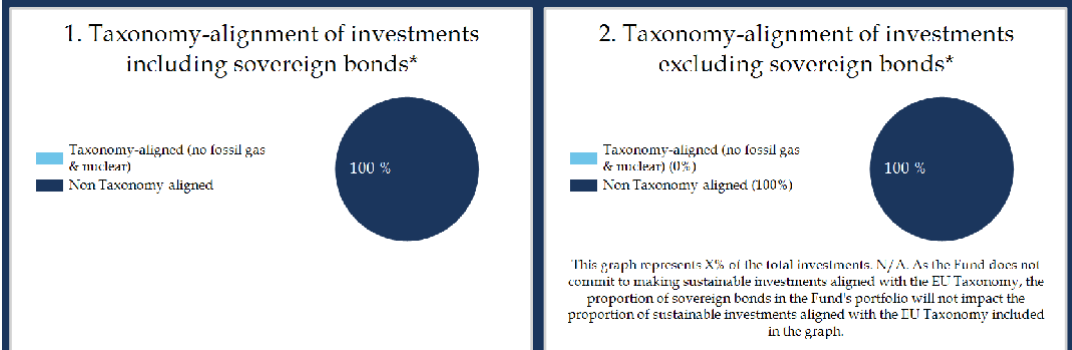
Although the Fund commits to invest in Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of EU Taxonomy-aligned investments is 0%.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?

- Yes
- In fossil gas       In nuclear energy
- No

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

### What is the minimum share of investments in transitional and enabling activities?

Although the Fund commits to invest in Sustainable Investments within the meaning of the SFDR, the minimum share of investments in transitional and enabling activities is 0%.

are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Although the Fund commits to make Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of such investments with an environmental objective not EU Taxonomy-aligned is 10%.

These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.



### What is the minimum share of sustainable investments with a social objective?

Minimum 20% of the Fund's net assets invested in socially sustainable investments.



### What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The investments under '2 Not sustainable' may include cash and cash equivalents for liquidity purposes, and derivatives for EPM and hedging purposes.

There are no minimum environmental or social safeguards applied to investments made under '2 Not sustainable'.



### Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

*How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F001156\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001156)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Impact Fund**

This Fund is subject to the disclosure requirements of Article 9 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Impact Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Sustainable Objective

The Investment Manager will seek to understand some of the world's social and environmental problems and to identify and invest in companies that it believes are addressing these needs in a differentiated way through their core products and services. Through the Fund's investments, the Investment Manager seeks to improve access to, and quality of, basic life essentials, reduce inequality, and mitigate the effects of climate change.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI All Country World Index (the "Index") and achieve the objectives by investing primarily in global equities, focusing on companies whose core business, in the opinion of the Investment Manager, aims to generate positive social and/or environmental change alongside a financial return.

The Investment Manager will seek to identify the universe of these companies based on three primary impact categories: life essentials, human empowerment, and the environment. Within these categories, the Fund will aim to diversify across "Impact Themes" including, but not limited to the following:

- Life Essentials: affordable housing, clean water and sanitation, health, sustainable agriculture and nutrition.
- Human Empowerment: digital divide, education and job training, financial inclusion, safety and security.
- Environment: alternative energy, resource efficiency, resource stewardship.

The Investment Manager aims to select companies which the Investment Manager believes will offer an attractive return profile over the long term, for example, companies whose core products and services align with any one or a combination of different Impact Themes, whose social and/or environmental impact is quantifiable and where fundamental analysis supports a long-term return.

The Investment Manager relies on a bottom-up process for identifying and analyzing potential companies for investment. This process, among other sources, relies on internal research, industry and thematic research, field research, industry and thematic conferences and discussions, news media, company meetings, filings, financials, sustainability reports and sell-side or other third-party subscription research. In defining the opportunity set, the Investment Manager takes into account both quantitative and qualitative considerations to fulfil each of the three impact criteria:

- **Material:** Impact activity must be central to the investee company.
- **Additionality:** The Investment Manager evaluates each company's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.
- **Measurable key performance indicators (KPIs):** The impact case must be quantifiable. The Investment Manager uses company reports and proprietary models, to develop individualized KPIs to understand the nature of the impact generated by a portfolio company on an annual basis.



After a company meets the criteria for inclusion in the proprietary impact universe, only the companies that the Investment Manager believes have the most attractive risk/return profile and diversification properties are selected for inclusion in the portfolio. To evaluate this, the Investment Manager focuses on analyzing the quality of the company's assets, the company's industry structure and management's allocation of capital.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)
- Scarcity of natural resources & biodiversity
- Pollution & waste

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Lack of diversity at board or governing body level
- Corporate management practices
  - i. Inadequate external or internal audit
- The absence of appropriate and effective safeguards for employment related risks
  - i. Workplace accident prevention policy

Further details on the Sustainability Risks considered and their potential impacts are included under the heading **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Fund may hold concentrated positions within an Impact Theme and is expected to have a natural bias towards small to mid-capitalisation companies with compelling growth prospects. The Investment Manager seeks to ensure that the Fund is well diversified with stock selection being the primary driver of active risk. Whilst the Fund will generally be well diversified by country, currency, industry and issuer, it may hold positions that are concentrated in this manner from time to time.

The Index serves as a reference benchmark for performance comparison and market context purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is market capitalisation weighted and designed to measure the equity market

performance of developed and emerging markets. The Index does not take into account the environmental, governance and social characteristics referenced above.

The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold interests in limited partnerships and master limited partnerships as described in the section of the Prospectus entitled **Master Limited Partnerships** and securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund will generally invest in developed countries and may invest up to 40% of its Net Asset Value in any country which is considered by the Investment Manager to be an emerging market or a frontier market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make a limited investment in securities traded on Russian markets and may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising the market access products mentioned above as well as index futures and currency forward contracts to gain exposure to the instruments listed above in pursuit of the investment objectives and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally less than 10% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk

management method can be found in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock

Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing /Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Class BN Shares will commence on 23 April 2024 and close on 22 October 2024.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objectives. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent USD or
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N, DL, BN	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class BN** Shares are reserved exclusively for clients of a financial intermediary, approved by the Company, that hold the Shares on behalf of underlying beneficial holders. No distribution fee is paid in respect of Class BN Shares, instead a higher investment management fee relative to other Share Classes is applied, part of which is paid to the relevant intermediary holding these Share Classes to compensate them for distribution and/or shareholder services provided to underlying beneficial owners of these shares. For

further details of such rebate arrangements, please refer to the **Investment Management Fees** sub-section in the **Charges and Expenses** section of the Prospectus.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Preliminary Charge*</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
S	N/A	0.65%	N/A
T	N/A	N/A	N/A
D	5%	0.65%	0.65%
N	N/A	0.65%	N/A
DL	3%	0.65%	1.65%
BN	5%	1.30%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that

is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, DL and BN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in  
Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and  
Article 5, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Global Impact Fund**

**Legal entity identifier:**  
**549300XX6B6E7SN4RH43**

**Sustainable investment objective**

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 10%</b></p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 20%</b></p>	<p><input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of__% of sustainable investments</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with a social objective</p> <p><input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What is the sustainable investment objective of this financial product?**

**Sustainability indicators** measure how the sustainable objectives of this financial product are attained.

The Investment Manager will seek to understand some of the world’s social and environmental challenges and to identify and invest in companies that it believes addresses these challenges in a differentiated way through their core products and services. Through the Fund’s investments, the Investment Manager will make investment in companies that improve access to, and quality of, basic life essentials, reduce inequality, and mitigate the effects of climate change.

Within these categories, the Fund will aim to diversify across impact themes including, but not limited to, the following:

- Life Essentials addresses social objectives such as increasing access to affordable housing and improving access and outcomes related to health. Life essentials also addresses social and environmental objectives through increasing access to clean water & sanitation and sustainable agriculture & nutrition.
- Human Empowerment addresses social objectives such as bridging the digital divide, increasing access to education and job training, expanding financial inclusion, and increasing safety and security.
- Environment addresses environmental objectives such as combatting climate change through the development and promotion of alternative energy and resource efficiency, while also considering resource stewardship.

The Investment Manager relies on a bottom-up process for identifying and analyzing potential companies for investment. This process, among other sources, relies on internal research, industry and thematic research, field research, industry and thematic conferences and discussions, news media, company meetings, filings, financials, sustainability reports and sell-side or other third-party subscription research. In defining the opportunity set, the Investment Manager takes into account both quantitative and qualitative considerations to fulfil each of the three impact criteria:

- **Material:** Impact activity must be central to the investee company. To determine this, the Investment



Manager evaluates a company's business units, product lines and services. Primary considerations are (a) the importance of the social problem being addressed and the alignment with our impact themes and (b) the

materiality of impact activities to a company's overall activity (which needs to account for 50% or more of revenues).

- **Additionality:** The Investment Manager evaluates each company's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.
- **Measurable key performance indicators (KPIs):** The impact case must be quantifiable. The Investment Manager uses company reports and proprietary models, to develop individualized KPIs to understand the nature of the impact generated by a portfolio company on an annual basis.

The Fund expects to maintain a minimum of 90% of its net assets in companies which meet the above criteria and which are assessed to be Sustainable Investments. Sustainable Investments may contribute to either environmental or social objectives. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 10% in Sustainable Investments with an environmental objective and at least 20% in Sustainable Investments with a social objective.

A reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

*What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?*

The percentage of the Fund's net assets in companies that are considered Sustainable Investments and contribute to the Funds impact categories of life essentials, human empowerment and the environment. The Fund will maintain at least 90% of its net assets in shares of companies that meet these criteria.

*How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?*

Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign Principal Adverse Impacts, as appropriate for the asset type, and as listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs").

PAIs are assessed quantitatively, according to third party data, or qualitatively by the Investment Manager's research analysts and investment teams using internal research and analysis regarding issuer activities.

Where PAI data is lacking or unavailable, and as applicable to the asset type, the Investment Manager will conduct further due diligence and qualitatively assess the issuer's activities, processes or policies related to climate, environmental, social and/or anti-bribery/anti-corruption matters to determine that the issuer is not doing significant harm.

**PAI Criteria**

Where the PAIs reflect a quantitative data point and such quantitative data is available, each Sustainable Investment is compared against quantitative thresholds set by the Investment Manager as applicable to the asset type. The thresholds may be determined by setting express conditions or fixed numerical thresholds for a given PAI. For example, companies which produce controversial weapons are excluded in accordance with the Exclusions Policy, while the greenhouse gas emissions PAI threshold is applied to issuers included within the Climate Action 100+ list as the largest corporate greenhouse gas emitters. The Climate Action 100+ list is comprised of corporate issuers representing approximately 80% of global corporate GHG emissions. Companies on the Climate Action 100+ list which have reported against TCFD standards and have stated interim and long-term decarbonization / net zero goals are not deemed to be doing significant harm.

Certain PAIs are evaluated relative to industry peers and the worst companies in those industries will set the standard for determining significant harm. Where the Investment Manager has determined that industry differentiation is less meaningful, thresholds will be set in the context of all issuers. As an example, the carbon footprint and greenhouse gas intensity of investee companies PAI's are evaluated relative to industry peers, and the threshold is reached where companies are determined to be among the highest within any of the MSCI-defined Global Industry Classification Standard (GICS) Level 3 industries with respect to greenhouse gas intensity or carbon footprint.

Where the Investment Manager has determined that differentiation is less meaningful or for PAIs which are more qualitative in nature (e.g. PAIs relating to the UNGC principles and the OECD Guidelines) significant harm is assessed by evaluating, among others, companies' activities, management policies and practices or unresolved controversies using third party data. For some indicators (e.g. board gender diversity and gender pay gap evaluation), the Investment Manager looks at third party data regarding, among others, discrimination and workforce diversity controversies along with evaluation of the presence of women in the decision-making bodies of the company.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Investment Manager uses PAI data in its investment research tools, portfolio management tools and trading compliance system. Issuers who fail to pass the Investment Manager's criteria may not be held in portfolios and designated as Sustainable Investments. Assessment against the PAIs for the purpose of ensuring that Sustainable Investments do not significantly harm environmental or social objectives includes the following:

- Exclusions with respect to the production of controversial weapons, revenues associated with thermal coal extraction or power generation and revenues associated with the production and generation of oil sands are applied in accordance with the Exclusions Policy in order to avoid significant activities associated with controversial weapons and fossil fuels PAIs.
- The Investment Manager uses third party data to understand the negative impact an issuer may have on a given PAI and sets pre-defined thresholds within each PAI which are applied on a pre-trade basis as applicable for the asset class. Where third party data indicates that an issuer is potentially doing significant harm according to the PAI threshold, the Investment Manager conducts additional due diligence using a variety of internal research and external data to determine whether the data is accurate.
- Where third party data is unavailable regarding a specific PAI, the Investment Manager conducts additional due diligence using a variety of internal research and external data (including by looking at public disclosures or reporting or via outreach directly to the issuer itself) to assess that the issuer is not doing significant harm.
- Where third party data indicates that the thresholds set for one or more PAIs have been reached and such data is found to be correct, the Investment Manager may further evaluate and engage with the issuer to ensure the issuer is aware of the harm or identified controversy and is taking active steps to mitigate or remediate such harm including with respect to transitioning away from potentially harmful activities. Where PAI data may not be relevant to investments in specific issuer projects such as use-of-proceeds bonds, the Investment Manager may also further evaluate the specific nature of such projects or activities in order to confirm that such activities are not being carried out in a way that causes significant harm.
- Where an issuer is confirmed to have reached a relevant PAI threshold and is not engaging with the Investment Manager to address it, the Investment Manager will not invest in such an issuer or will seek to divest in the best interests of Fund investors.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested as part of the Investment Manager's process to identify Sustainable Investments. Assessment of management policies and practices are necessary to determine alignment. Misalignment with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights may be determined where the Investment Manager identifies UN Global Compact non-compliance, inadequate policies and/or unresolved controversies.

Issuers assessed to be in breach of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of human Right are not eligible to be classified as Sustainable Investments.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

The Fund's Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign PAIs to determine that the Sustainable Investments do not cause significant harm to any environmental or social sustainable objective. In addition, by virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the PAIs into consideration either directly or indirectly on all or a portion of the Fund as follows:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy , and also includes petroleum - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr) .



## What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the Fund's Sustainable Investment Objective is described below.

The Investment Manager will seek to identify the universe of these companies based on three primary impact categories: life essentials, human empowerment and the environment. Within these categories, the Fund will aim to diversify across impact themes including, but not limited to, the following:

- Life essentials – affordable housing; clean water and sanitation; health; and sustainable agriculture and nutrition
- Human empowerment – digital divide; education and job training; financial inclusion; and safety and security
- Environment – alternative energy; resource efficiency; and resource stewardship

The Investment Manager relies on a bottom-up process for identifying and analyzing potential companies for investment. This process, among other sources, relies on internal research, industry and thematic research, field research, industry and thematic conferences and discussions, news media, company meetings, filings, financials, sustainability reports and sell-side or other third-party subscription research. In defining the opportunity set, the Investment Manager takes into account both quantitative and qualitative considerations to fulfil each of the three impact criteria:

- Material: Impact activity must be central to the investee company. To determine this, the Investment Manager evaluates a company's business units, product lines and services. Primary considerations are (a) the importance of the social problem being addressed and the alignment with our impact themes and (b) the materiality of impact activities to a company's overall activity (which needs to account for 50% or more of revenues).
- Additionality: The Investment Manager evaluates each company's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist.
- Measurable key performance indicators (KPIs): The impact case must be quantifiable. The

Investment Manager uses company reports and proprietary models, to develop individualized KPIs to understand the nature of the impact generated by a portfolio company on an annual basis.

After a company meets the criteria for inclusion in the proprietary impact universe, only the companies that the Investment Manager believes have the most attractive risk/return profile and diversification properties are selected for inclusion in the portfolio. To evaluate this, the Investment Manager focuses on fundamental considerations, including, but not limited to analyzing the quality of the company's assets, the company's industry structure, and management's allocation of capital.

The Investment Manager believes identifying investment opportunities which generate a positive impact requires bottom-up fundamental research. However, the Fund also uses screening to ensure certain investments are excluded, in addition to the Exclusion Policy, further details of which can be found in the section of the Prospectus entitled Exclusions. These include companies principally involved in the following industries: tobacco, firearms, defence, nuclear, coal, petroleum, adult entertainment, gambling and alcohol as these are companies the Investment Manager believes run counter to, or undermine, the Fund's sustainable investment objective.

### *What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?*

The Investment Manager will only invest in securities that are considered Sustainable Investments and materially align with at least one of the impact themes which fall into three primary impact categories of life essentials, human empowerment and the environment, offer additionality and where the impact can be measured.

The Investment Manager will not invest in any securities that are assessed at the time of purchase not to generate more than 50% of their revenue from activities that are related to the Funds impact themes. Securities will be assessed thereafter on an annual basis for as long as the security is held. If an issuer has been found, upon the receipt and review of updated annual disclosures, that it no longer meets the 50% threshold, the Investment Manager will engage with the issuer to understand the drivers of this change. If the Investment Manager determines the shift in revenue is temporary or caused by external disruptions which the company can not control, the security may continue to be held in the Fund provided that it is assessed the following 12 months to have generated more than 50% of their revenue from activities that are related to the Funds impact themes.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.



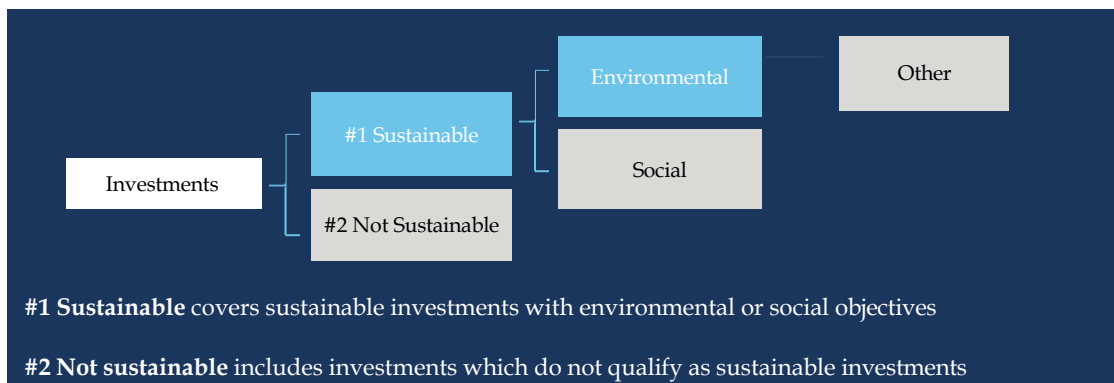
**What is the asset allocation and the minimum share of sustainable investments?**

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, the Fund will have a minimum of 90% of its net assets aligned with the #1 Sustainable category, as defined in the diagram below, with the proportion of Sustainable Investments with environmental versus social objectives varying based on the Fund’s composition. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 10% in Sustainable Investments with an environmental objective and at least 20% in Sustainable Investments with a social objective.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social objective may affect the Fund’s ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund’s ability to attain its environmental or social objective.

Taxonomy-aligned activities are expressed as a share of:  
 - **turnover** reflecting the share of revenue from green activities of investee companies  
 - **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.  
 - **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



*How does the use of derivatives attain the sustainable investment objective?*

Derivatives are used by the Fund to a limited extent for the purpose of attaining the sustainable investment objective of the Fund.



*To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

Although the Fund commits to invest in Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of EU Taxonomy-aligned investments is 0%.

*Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
  - In fossil gas
  - In nuclear energy
- No

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

### What is the minimum share of investments in transitional and enabling activities?

Although the Fund commits to invest in Sustainable Investments within the meaning of the SFDR, the minimum share of investments in transitional and enabling activities is 0%.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Although the Fund commits to make Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of such investments with an environmental objective not EU Taxonomy-aligned is 10%.

These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.



### What is the minimum share of sustainable investments with a social objective?

Minimum 20% of the Fund's net assets invested in socially sustainable investments.



### What investments are included under "#2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

The investments under '#2 Not sustainable' may include cash and cash equivalents for liquidity purposes, and derivatives for EPM and hedging purposes.

There are no minimum environmental or social safeguards applied to investments made under '#2 Not sustainable'.

### Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the Sustainable Investment objective of the Fund.

### How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



#### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000044\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000044)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Durable Companies Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Durable Companies Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## **INVESTMENT OBJECTIVE AND POLICY OF THE FUND**

### **Investment Objective**

The investment objective of the Fund is to seek long-term total returns.

### **Investment Policies**

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily by investing globally in companies that the Investment Manager considers to be durable companies. Durable companies are those that the Investment Manager considers to exhibit stability and anticipates will generate positive returns over time. Stability is defined by the Investment Manager as a profit base that is not likely to decline significantly from current levels and the possibility of future value creation largely through management's ability to allocate capital effectively. The merits of stability are widely appreciated by the market and so are often reflected in the valuation of well-known stable businesses. In order to identify these businesses at more attractive valuations, the Investment Manager looks for stability in less conventional places such as a) mid and small capitalisation companies, industry sectors considered from time to time by the Investment Manager to be more volatile and geographies that are typically less favoured by the investment industry and b) in companies that do not grow fast enough for growth investors, lack the blue chip financial characteristics sought by quality investors and are not cheap enough for value investors.

The Investment Manager utilizes a proprietary ratings system to provide a framework for assessing new investment opportunities, and on an ongoing basis, with companies scored on the criteria below. The rating is not a buy or sell signal but rather helps identify potential issues and provides a starting point for deeper analysis and/or engagement. However, ratings will not in isolation drive the selection or exclusion of an issuer or security from the investment universe:

- Resilience: The Investment Manager's view of, and confidence in, where the business will be in the future. Key components of this score include business cyclicality, industry structure, business model, and financial leverage.
- Growth: The Investment Manager seeks to quantify the future growth opportunity, adjusted for magnitude, duration, and return on capital.
- People: A view of the management's ability to be enhancing, detracting, or neutral to the long-term opportunity. This includes an assessment of incentives, compensation levels, and insider ownership.
- Price: A measurement of the intrinsic return potential of the company to ensure the above criteria are appropriately reflected in the price, which in turn is supportive of the long-term objective of the Fund.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The MSCI All Country World Index (the "Index") serves as a reference benchmark for market context and WACI comparison purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is designed to measure equity market performance of developed and emerging markets.

The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in developed countries and any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make limited investment in securities traded on Russian markets and may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs comprising the market access products mentioned above as well as index futures and currency forwards, both long and short, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio

management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

Whilst the Fund is unconstrained by market capitalization, country or sector, it is expected to have a bias towards small to mid-capitalisation companies and may be concentrated by country or sector. The Fund will also be concentrated in the number of individual companies held and should be expected to have low turnover.

Generally, less than 10% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
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Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Each Business Day is a Dealing Day;

A list outlining the expected Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.



**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee, Distribution Fee and Performance Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below. The Investment Management Fee is paid monthly in arrears whilst the the Distribution Fee is paid quarterly in arrears. The Performance Fee, if applicable, is generally crystallized at the Fund's fiscal year end and paid shortly thereafter. The Performance Fee Type applicable to this Fund is 'Hurdle'. Please refer to the **Performance Fees** section of the Prospectus for more detail.

Share Class Name	Maximum Preliminary Charge*	Investment Management Fee	Distribution Fee	Performance Fee	Predefined Rate** (for Hurdle)
S	N/A	0.60%	N/A	10%	8%
T	N/A	N/A	N/A	N/A	N/A
D	5%	0.60%	0.75%	10%	8%
N	N/A	0.60%	N/A	10%	8%

\*Payable to financial adviser or intermediary

\*\*The predefined rate is an additional amount added to the Hurdle which is set on a fund by fund basis and approved by the Directors.

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Durable Companies Fund

**Legal entity identifier:**  
549300MTQFV76KPFJ821

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers with disclosed carbon data that enable the Fund to achieve long term net zero carbon intensity by 2050 by aiming to reduce its weighted average carbon intensity ("WACI"), as compared to the 2019 WACI of the MSCI All Country World Index (the "Index").
2. Companies are screened to enable the Fund to exclude investments in companies involved in the production and sales of fossil fuels, or the mining of metals.
3. Companies are screened for United Nations Global Compact Principles to enable the Fund aims to exclude investment in companies that are involved in known controversies regarding child labour or forced labour by excluding investments in companies which are assessed to have failed United Nations Global Compact Principles 4 and 5.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage difference of the Fund's WACI and the Index's 2019 WACI.

The number of securities of any company involved in the production and sales of fossil fuels, or the mining of metals, as defined by standard industry classifications for Energy, and Metals and Mining.

The number of companies held identified which have been assessed to be in violation of United Nations

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour).

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will aim to reduce its weighted average carbon intensity (“WACI”) to net zero by 2050, or sooner, in accordance with the Paris Agreement. - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy. In addition the Fund will exclude companies engaged in the production and sales of fossil fuels. - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the Fund's WACI compared to the 2019 WACI of the Index and adjusts it over time in order to target net zero emissions by 2050 in alignment with the Paris Agreement.

The Fund excludes investments in companies involved in the production and sales of fossil fuels, or the mining of metals.

The Investment Manager excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will have a WACI that is no less than 50% below the Index's 2019 WACI by 2030 and aim to achieve net zero by 2050. As an interim milestone, the Investment Manager is committed to limit the Fund's contribution to climate change by targeting a carbon footprint as measured by WACI that is at least 25% less than the Index's 2019 WACI baseline as referenced by the Index as it transitions towards its 2030 and 2050 carbon footprint reduction goals as specified above.

The Fund excludes securities of any company involved in the production and sales of fossil fuels, or the mining of metals, as defined by standard industry classifications for Energy, and Metals and Mining.

The Fund excludes companies held identified using third party data which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour).

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

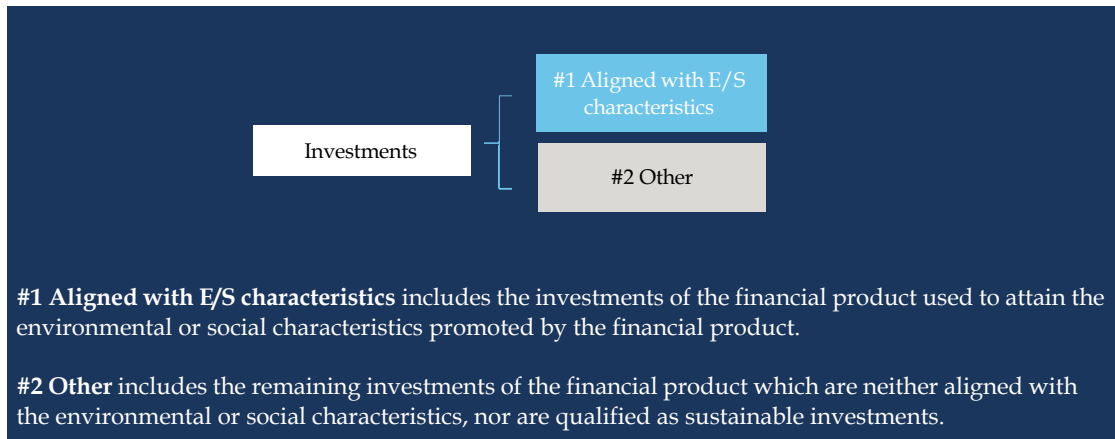
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas       In nuclear energy
- No

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ' #2 Other ' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.

However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



#### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000025\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000025)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Durable Enterprises Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Durable Enterprises Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily by investing globally in companies that the Investment Manager considers to be durable companies and that have a minimum market capitalisation of USD 2 billion at initial purchase. Durable companies are those that the Investment Manager considers to exhibit stability and anticipates will generate positive returns over time. Stability is defined by the Investment Manager as a profit base that is not likely to decline significantly from current levels combined with the possibility of future value creation largely through management's ability to allocate capital effectively. The merits of stability are widely appreciated by the market and so are often reflected in the valuation of well-known stable businesses. In order to identify these businesses at more attractive valuations, the Investment Manager looks for stability in less conventional places such as a) mid and small capitalisation companies, industry sectors considered from time to time by the Investment Manager to be more volatile and geographies that are typically less favoured by the investment industry and b) in companies that do not grow fast enough for growth investors, lack the blue chip financial characteristics sought by quality investors and are not cheap enough for value investors.

The Investment Manager utilizes a proprietary ratings system to provide a framework for assessing new investment opportunities, and on an ongoing basis, with companies scored on the criteria below. The rating is not a buy or sell signal but rather helps identify potential issues and provides a starting point for deeper analysis and/or engagement. However, ratings will not in isolation drive the selection or exclusion of an issuer or security from the investment universe:

- Resilience: The Investment Manager's view of, and confidence in, where the business will be in the future. Key components of this score include business cyclicality, industry structure, business model, and financial leverage.
- Growth: The Investment Manager seeks to quantify the future growth opportunity, adjusted for magnitude, duration, and return on capital.
- People: A view of the management's ability to be enhancing, detracting, or neutral to the long-term opportunity. This includes an assessment of incentives, compensation levels, and insider ownership.
- Price: A measurement of the intrinsic return potential of the company to ensure the above criteria are appropriately reflected in the price, which in turn is supportive of the long-term objective of the Fund.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

## Social

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

## Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The MSCI All Country World Index (the "Index") serves as a reference benchmark for market context and WACI comparison purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is designed to measure equity market performance of developed and emerging markets.

The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in developed countries and any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make limited investment in securities traded on Russian markets and may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs comprising the market access products mentioned above as well as index futures and currency forwards, both long and short, to gain

exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund is expected to have a bias towards small to mid-capitalisation companies. The Investment Manager may choose to retain or add to a security that has fallen below the minimum market capitalisation of USD 2 billion at initial purchase. The Fund is also unconstrained by country or sector and may be concentrated by country or sector from time to time. The Fund will also be concentrated in the number of individual companies held and should be expected to have low turnover.

Generally, less than 10% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%

SFTs	1%	60%
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Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).



**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Charge*</b>	<b>Preliminary</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
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S	N/A	0.70%	N/A
T	N/A	N/A	N/A
D	5%	0.70%	0.70%
N	N/A	0.70%	N/A
DL	3%	0.70%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Durable Enterprises Fund

**Legal entity identifier:**  
549300ZTIORKTP9IM453

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers with disclosed carbon data that enable the Fund to achieve long term net zero carbon intensity by 2050 by aiming to reduce its weighted average carbon intensity ("WACI"), as compared to the 2019 WACI of the MSCI All Country World Index (the "Index").
2. Companies are screened to enable the Fund to exclude investments in securities of any company involved in the production and sales of fossil fuels, or the mining of metals.
3. Companies are screened for United Nations Global Compact Principles to enable the Fund to exclude investment in companies that are involved in known controversies regarding child labour or forced labour by excluding investments in companies which are assessed to have failed United Nations Global Compact Principles 4 and 5.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage difference of the Fund's WACI and the Index's 2019 WACI.

The number of securities of any company involved in the production and sales of fossil fuels, or the mining of metals, as defined by standard industry classifications for Energy, and Metals and Mining.

The number of companies held identified which have been assessed to be in violation of United Nations

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour).

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will aim to reduce its weighted average carbon intensity (“WACI”) to net zero by 2050, or sooner, in accordance with the Paris Agreement. - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.

3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy. In addition the Fund will exclude companies engaged in the production and sales of fossil fuels. - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund’s exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the Fund's WACI compared to the 2019 WACI of the Index and adjusts it over time in order to target net zero emissions by 2050 in alignment with the Paris Agreement.

The Fund excludes investments in securities of any company involved in the production and sales of fossil fuels, or the mining of metals.

The Investment Manager excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will have a WACI that is no less than 50% below the Index's 2019 WACI by 2030 and aim to achieve net zero by 2050. As an interim milestone, the Investment Manager is committed to limit the Fund's contribution to climate change by targeting a carbon footprint as measured by WACI that is at least 25% less than the Index's 2019 WACI baseline as referenced by the Index as it transitions towards its 2030 and 2050 carbon footprint reduction goals as specified above.

The Fund excludes securities of any company involved in the production and sales of fossil fuels, or the mining of metals, as defined by standard industry classifications for Energy, and Metals and Mining.

The Fund excludes companies held identified using third party data which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour).

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

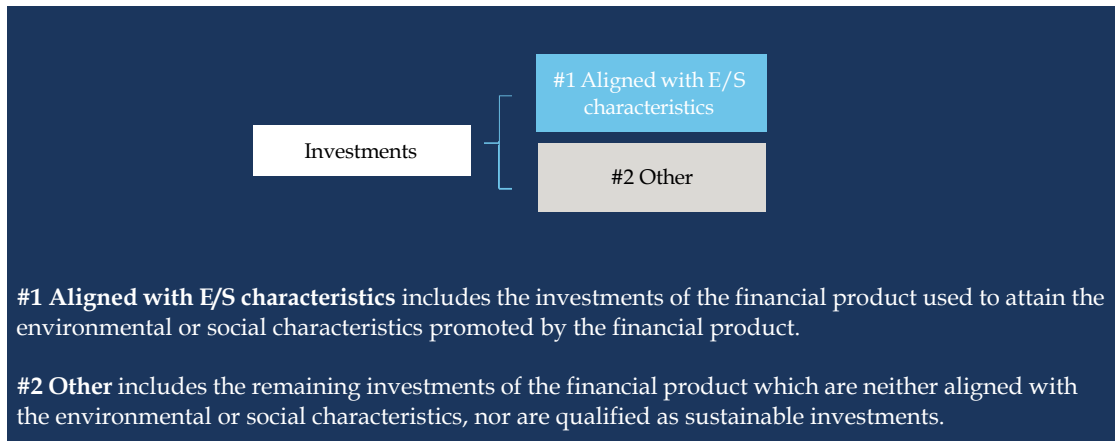
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.

However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



#### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000646\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000646)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

Dated 22 April 2024

### Wellington Enduring Assets Fund

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Enduring Assets Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily through global investment in companies that own long-lived physical assets (such as companies in the utility, transportation, energy, real estate, and industrial sectors). The Investment Manager will seek to invest in companies which it believes possess an advantaged competitive position, such as companies in monopolistic industries or that have products that are non-discretionary with limited substitution risk, and that exhibit low levels of earnings volatility in order to mitigate against the risk of losing capital relative to global equities in periods of market stress. No industry is formally excluded from the investment universe. The Fund will be concentrated in terms of individual companies held and from time to time by industry sectors, but is expected to be diversified by country. The Fund is expected to have a low to moderate turnover.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

As from the date of this Supplement, this Fund is exposed to a moderate level of Sustainability Risk whose associated unexpected loss can be material. Sustainability Risks may change over time and there is no guarantee that the Investment Manager's approach to Sustainability Risk will limit or prevent losses from arising.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The MSCI All Country World Index (the "Index") serves as a reference benchmark for market context purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during

portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is designed to measure equity market performance of developed and emerging markets.

The Fund will invest, directly or through FDIs (set out in the Prospectus), in the following instruments in pursuit of the Fund's investment objective: equity securities or other FDIs or securities with equity characteristics (including securities issued through private placements as described in the section of the Prospectus entitled **Private Placements**) comprising preferred stocks, depository receipts (such as ADRs, GDRs and European Depository Receipts), market access products (including warrants on equities, options on equities and equity swaps) for securities issued by companies worldwide. These will be issued by developed and emerging market issuers that, while not located in an emerging market, conduct substantial business in emerging markets as determined by the Investment Manager, including (i) companies that have substantial assets in emerging markets; and (ii) companies that derive a substantial portion of their total revenues from either goods and services produced in, or sales made in, emerging markets. From time to time, the Investment Manager may perceive that there are opportunities to enhance total returns by investing, up to 10% of the net asset value of the Fund, in bonds issued by government, agency, and supranational issuers; corporate and real estate investment trust debt; convertible bonds; capital securities (securities that combine the features of corporate bonds and preferred stock) issued by public or private issuers, both fixed and floating rate. There will be no limitations on the credit quality of individual securities in the Fund and the Fund will invest in securities denominated in multiple currencies.

The Fund may invest in companies across the market-capitalisation spectrum and may have exposure to various currencies, however it may also be concentrated in industry sectors. Generally, up to 10% of the Net Asset Value of the Fund will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

The Fund may invest in developed markets and may also invest more than 20% in emerging markets as defined by MSCI. The Fund may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund may invest in exchange traded funds that invest in the types of securities listed above and which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and exchanges as set out in Appendix I of the Prospectus and may be transferable securities or collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, (such as warrants, futures contracts, options, swaps and deliverable and non-deliverable forward contracts) from time to time as a means of indirectly gaining exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes (including to create or reduce exposures in certain countries or geographic regions and hedging against risk), as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset

Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market

- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	or
T, G		USD 5 million		
D, N, DL		USD 5,000		
GD, GN		USD 5,000	N/A	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.



**Class G Shares** (including the **Class GN and Class GD Shares**) are reserved for existing Shareholders whose previous Shares have been changed, and serves as a “grandfathered” Class enabling the Shareholders to remain invested without undergoing those changes. The G, GD and GN Classes in the Fund are only available to those investors that were holding Shares in the Fund as at 29 March 2019. A distribution fee is payable in respect of the GD Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee, Distribution Fee and Performance Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below. The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears. The Performance Fee, if applicable, is generally crystallized at the Fund’s fiscal year end and paid shortly thereafter. The Performance Fee Type applicable to this Fund is 'Hurdle'. Please refer to the Performance Fees section of the Prospectus for more detail.

<b>Share Class Name</b>	<b>Maximum Preliminary Charge*</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>	<b>Performance Fee</b>	<b>Predefined Rate** (for Hurdle)</b>
S	N/A	0.70%	N/A	N/A	N/A
T	N/A	N/A	N/A	N/A	N/A
D	5%	0.70%	0.75%	N/A	N/A
N	N/A	0.70%	N/A	N/A	N/A
DL	3%	0.70%	1.65%	N/A	N/A

G	N/A	0.60%	N/A	10%	8%
GD	5%	0.60%	0.75%	10%	8%
GN	N/A	0.60%	N/A	10%	8%

\*Payable to financial adviser or intermediary

\*\*The predefined rate is an additional amount added to the Hurdle which is set on a fund by fund basis and approved by the Directors.

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D DL and GN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
Wellington Enduring Assets Fund

**Legal entity identifier:**  
549300OOHKL3RMXBI23

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet the following environmental characteristic.

The Fund invests in companies with an E Rating of 1-3 and will limit its investments in companies with a below-average E Ratings relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in companies with an E Rating of 1-3.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager will invest a minimum percentage of the Fund's net assets in companies with an E Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest at least 70% of the Fund's net assets in companies with an E Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

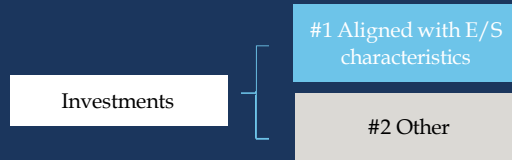
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

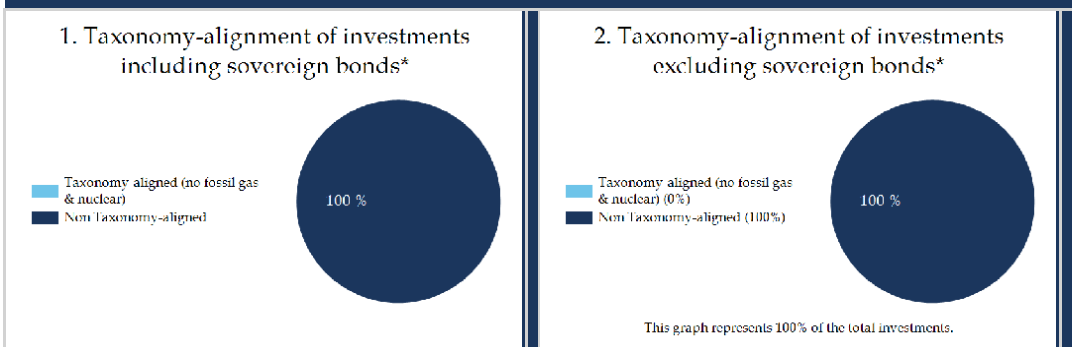
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes derivatives for investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000035\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000035)%26languageCd=EN&recentMatch=true&download=true)



The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington FinTech Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington FinTech Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the the MSCI All Country World Index (the "Index") and achieve the objective, primarily through investment in companies globally that leverage technology to enhance or disrupt traditional financial services.

The Investment Manager seeks to achieve the objective by investing in financial technology companies and/or companies where the key growth driver is to provide or use technology to deliver the next generation of financial services ("FinTech"). The digital transformation of the global financial services industry through the use of technology and data is increasingly becoming a driver of success for companies and is creating what the Investment Manager anticipates to be compelling investment opportunities. The Investment Manager believes such opportunities will generate positive returns over a longer time period than many market participants anticipate due to such factors as the inertia of consumer preferences which makes change slow, regulatory hurdles, and the complexity of the finance industry which makes it harder for new entrants to disrupt established companies. The Investment Manager further believes that its ability to combine financial and technology sector analysis and expertise is key to identifying the companies most likely to be long-term beneficiaries of change in this space. The Investment Manager will use its centralised research platform to discover opportunities for investment in companies globally within FinTech, in areas such as payment systems, digitisation of financial services, and technology infrastructure. Assets for investment by the Fund are selected using fundamental, bottom-up, company specific analysis carried out by the Investment Manager. The analysis is focused on discovering technological leaders in the FinTech industry with attractive business models, better than expected long-term growth rates and management expertise.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- External social factors
  - i. Social controversy

#### Governance

- Lack of diversity at board or governing body level
- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

The Index serves as a reference benchmark for performance comparison and market context purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during

portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is market capitalisation weighted and designed to measure the equity market performance of developed and emerging markets.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, rights, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs comprising the market access products mentioned above as well as index futures and currency forwards, both long and short, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund takes an unconstrained approach to investing in FinTech companies across the capitalisation spectrum in developed and emerging markets globally, with sector and country allocations an outcome of the stock selection process. The Fund is expected to be reasonably diversified and to have a low turnover. The Fund may be concentrated in a relatively small number of securities and industry sectors and/or countries and, as a result, may be more volatile than more broadly diversified funds. The Fund is denominated in US Dollars and normally will not be hedged against currency fluctuations, although the Investment Manager may employ currency hedging to protect or enhance the value of the Fund's holdings when it believes it is advisable to do so.

The indices to which the Fund may gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

The Fund may invest in developed countries and any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make limited investment in securities traded on Russian markets and may invest in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [www.wellington.com](http://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S	USD 1 million	USD 1,000	
T and E	USD 5 million		
D, N, DL, ED, EN and BN	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class E** Shares are closed for additional subscriptions, as the total Net Asset Value of the Fund has reached USD150m or equivalent amount in another currency.

**Class EN** Shares are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S or E Shares. EN Shares are

closed for additional subscriptions, as the total Net Asset Value of the Fund has reached USD150m or equivalent amount in another currency. No distribution fee is paid in respect of the Class EN Shares.

**Class ED Shares** are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee of up to 0.80% of the Net Asset Value attributable to the Class ED Shares is payable. ED Shares are closed for additional subscriptions, as the total Net Asset Value of the Fund has reached USD150m or equivalent amount in another currency.

**Class BN Shares** are reserved exclusively for clients of a financial intermediary, approved by the Company, that hold the Shares on behalf of underlying beneficial holders. No distribution fee is paid in respect of Class BN Shares, instead a higher investment management fee relative to other Share Classes is applied, part of which is paid to the relevant intermediary holding these Share Classes to compensate them for distribution and/or shareholder services provided to underlying beneficial owners of these shares. For further details of such rebate arrangements, please refer to the **Investment Management Fees** sub-section in the **Charges and Expenses** section of the Prospectus.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.80 %	N/A

T	N/A	N/A	N/A
D	5%	0.80%	0.80%
N	N/A	0.80%	N/A
DL	3%	0.80%	1.65%
E	N/A	0.55%	N/A
ED	5%	0.55%	0.80%
EN	N/A	0.55%	N/A
BN	5%	1.60%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D DL, ED, EN and BN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the Charges and Expenses section of the Prospectus.



**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington FinTech Fund**

**Legal entity identifier:**  
**54930017IURBEIXFLC42**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet the following social characteristic.

The Fund aims to promote gender diversity in board representation amongst a portion of the investee companies by investing a portion of the Fund's net assets in companies that appoint three or more women to their board.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's net assets invested in companies with three or more women on their board.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.
3. The Fund will invest at least 51% of the Fund's net assets in companies that seek to promote diversity by appointing three or more women to their board - PAI: Board Gender Diversity.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager invests a portion the Fund's net assets in companies with three or more women on their board.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest at least 51% of the Fund's net assets in companies that seek to promote diversity by appointing three or more women to their board.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 51% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

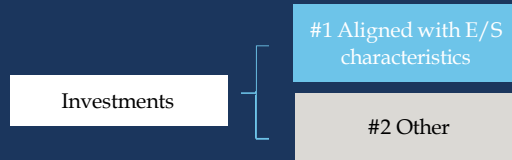
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

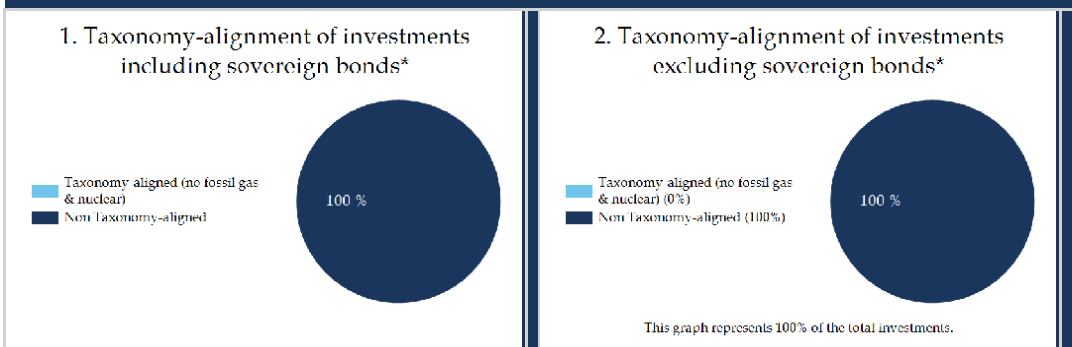
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F001053\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001053)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Bond Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the Bloomberg Global Aggregate Index (the "Index") and achieve the objective, primarily through investment in a globally diversified portfolio of fixed income securities. The Fund's investment approach seeks to identify a diversified set of independent investment ideas, to efficiently allocate capital to those investment ideas and aims to manage Fund risk across a team of multiple internal portfolio managers.

The Fund aims to draw on the following analyses to seek to meet its investment objective:

- **Macroeconomic Analysis.** The Investment Manager uses research-driven fundamental analysis to assess the performance of the broader economic and/or political environment in order to incorporate active positions in developed and emerging market bonds and currencies
- **Quantitative Analysis.** The Investment Manager uses a systematic, model-based approach to identify opportunities across developed government bond markets.
- **Credit Analysis.** The Investment Manager aims to generate returns through bottom-up security selection by looking for investment ideas across investment-grade corporate, high yield, sovereign and securitized (or asset-backed) sectors globally.

The Investment Manager also employs a risk management process intended to identify and minimise unintended areas of concentration which might result in the Fund's performance behaving in an unanticipated way.

The Fund's duration (sensitivity to bond prices related to changes in interest rates) is expected to typically range within +/- 2 years of the duration of the Index and is expected to have high average credit quality.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy



### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index is comprised of fixed income securities from a broad array of geographies and sectors with a maturity of over one year.

The Fund will invest, either directly or indirectly (both long and short) through the use of FDIs, in debt securities of issuers domiciled around the world for investment purposes and for efficient portfolio management including hedging against risk. The Fund may buy and sell bonds issued by government, agency, and supranational issuers; mortgage, commercial mortgage, and asset-backed securities; convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, corporate and real estate investment trust debt; credit-linked, index-linked, and capital securities (securities that combine the features of bonds and preferred stock); warrants, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations) and, in addition, bank loan assignments that qualify as Money Market Instruments; as well as other debt securities issued by public or private issuers, both fixed and floating-rate, including forward contracts on such securities. The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will typically be positive, meaning that long positions will generally be in greater proportion than synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 0% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

Currency exposure will be taken on an opportunistic basis. Currency exposure including cross-currency positions, which are not related to the Fund's bond and cash equivalent positions, may be assumed.

Investments will represent a broad credit spectrum, including issues rated below investment-grade. There is no minimum credit rating for individual securities or currencies.

The Fund generally will be diversified by country, currency and issuer relative to the global bond market. The Fund will conduct most of its trading in the United States, Canada, Europe, Japan and Australia. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**).

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 50% and 800% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of the FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	20%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

## German Taxation

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review

this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or)
S	USD 1 million	USD 1,000	
T, G	USD 5 million		
D, N, DL	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against other currencies in which the assets of the Fund are denominated (based on the Index weights).

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N Shares** are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL Shares** are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class DL Shares is payable.

**Class G Shares** are reserved for existing Shareholders whose previous Shares have been changed, and serves as a “grandfathered” Class enabling the Shareholders to remain invested without undergoing those changes. The G Class is only available to those investors that were holding B Shares in the Fund as at 17 January 2012.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.35%	N/A
T	N/A		N/A	N/A
D	5%		0.45%	0.50%
N	N/A		0.45%	N/A
DL	3%		0.45%	1.10%
G	N/A		0.35%	0.30%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Global Bond Fund

**Legal entity identifier:**  
FQS4MV2D2R1KECM0PF58

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers that are screened to enable the Fund to limit its exposure to sovereign issuers whose fossil fuels exports represent a significant portion of their total exports.
2. Issuers with an E or S Rating to enable the Fund to exclude investment in the worst rated corporate issuers with the worse E or S Ratings relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in sovereign issuers where fossil fuels make up more than 67% of their exports.

The number of corporate bonds held with an E Rating or S Rating of 5.

#### *What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).





## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund restricts its investment in sovereign issuers where fossil fuels make up more than two-thirds (67%) of exports to a maximum percentage of the Fund's NAV.

The Fund excludes investment in corporate issuers with an E or S Rating of 5, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund restricts investment in sovereign issuers where fossil fuels make up more than 67% of their exports to a maximum of 1.5% of the Fund's NAV.

The Fund excludes corporate issuers rated 5 for E or S Rating using a rating scale of 1-5, where 1 is the highest rating.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 65% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

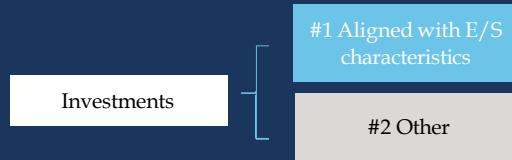
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

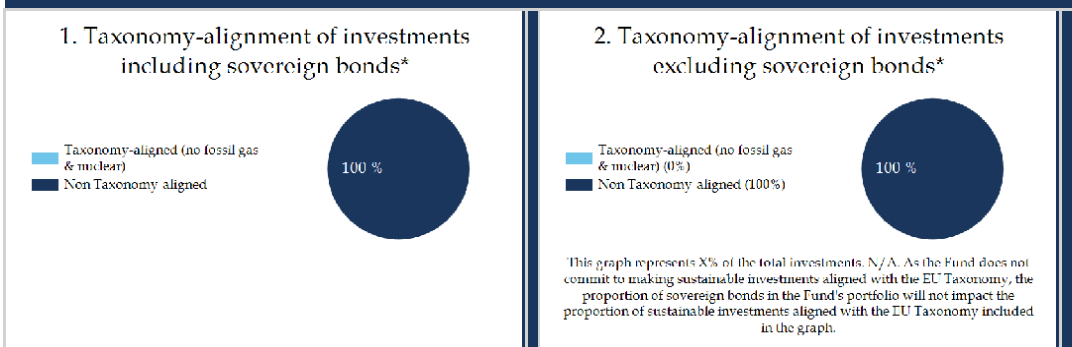
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000038\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000038)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

Dated 22 April 2024

### Wellington Global Credit ESG Fund

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Credit ESG Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns in excess of the Custom Bloomberg Global Aggregate Corporate (Fin 40% cap) USD/Euro/GBP 1% Cap \$500M Min Index (ex Tier 1, Upper Tier 2, and Capital Credit securities) Index (the "Index"). The Index is composed of investment grade corporate bonds with minimum amounts outstanding denominated in US Dollars, euros, and Sterling within the industrial, utility and financial services sectors with individual issuers capped at 1%, financials capped at 40% and excluding certain subordinated debt instruments.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective, primarily investing in a diversified portfolio of investment grade corporate debt instruments. The Fund's strategy is based on the philosophy that credit is a cyclical asset class, and so a thorough understanding of macro and market environments is critical to interpreting and anticipating changes in credit cycles. The Investment Manager also believes inefficiencies exist in the pricing of credit risk and so the Fund seeks to generate consistent active returns through a disciplined investment process that integrates top-down analysis of global investment themes (e.g. long-term trends, economic cycles), and specialist research (e.g. industry and issuer analysis) on individual credit sectors with bottom-up corporate security selection.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

Subject to the Fund's ESG framework, the Fund invests in debt securities of issuers domiciled around the world (in both developed and emerging markets) including securities issued by commercial, governmental

or supranational entities, including residential and commercial mortgage-backed securities, asset-backed securities, corporate and real estate investment trust ("REIT") debt, credit-linked, index-linked, capital securities (securities that combine the features of bonds and preferred stocks), preferred stock, warrants, hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, as well as other types of debt securities, both fixed and floating-rate, including forward contracts on such securities, and hold equity securities where they are a result of a corporate action, conversion or exercising a warrant. The Fund may hold private placements, comprising those issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)) and Transferable Securities, such as loan participation securities that qualify as an eligible investment by the Fund, that reference bank loans or trade finance loans.

The Index may be considered during portfolio construction and is used for performance comparison and baseline WACI purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index is designed to measure the market performance of the broader US Dollar-, Euro-, and Sterling-denominated investment grade corporate credit market. The Index does not take into account the ESG and carbon characteristics referenced above.

The Fund generally will be diversified by country, currency, sector and issuer, but may hold positions that are concentrated from time to time. The Fund's weighted average credit quality is expected to be investment grade, but investments will be drawn from a broad credit spectrum. However, the Fund may only purchase securities if rated at least B3 by Moody's, B- by S&P, or B- by Fitch, or an equivalent internal rating by the Investment Manager. Any securities which fall below the minimum required rating subsequent to purchase will be sold within six months from the downgrading, unless the rating is upgraded within that period. Credit ratings for instruments will be the highest of Moody's, S&P, or Fitch's long-term ratings, or an equivalent internal rating by the Investment Manager. The Fund's Net Credit Exposure to securities rated below investment grade (including debt issued by issuers domiciled in emerging markets) will not represent more than 15% of its Net Asset Value at the time of purchase. The Fund's Net Credit Exposure to securitised debt instruments will not represent more than 30% of its Net Asset Value at the time of purchase. The Fund's Net Credit Exposure to convertible debt instruments will not represent more than 15% of its Net Asset Value at the time of purchase.

For the purposes of this Fund, the Investment Manager considers an emerging market as a country that has a long-term foreign currency rating below investment grade. If a security is unrated, then an implied credit rating, as deemed by the Investment Manager, may be used. The Fund may invest in securities traded in China via Bond Connect (see also section in the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**).

The Fund may buy and sell exchange-traded and over-the-counter derivative instruments, including interest rate, index (including credit index) and currency futures, currency, interest rate, total return swaps, and credit default swaps, currency, bond, and swap options, deliverable and non-deliverable currency

forward contracts and "to-be-announced" securities to gain both long and short exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 20% and 250% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds**.

Currency exposure, from the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Forward Contracts**, will be taken on an opportunistic basis. Such currency exposure may or may not be influenced by the Fund's bond and cash equivalent positions. The Fund will invest primarily in US Dollar-, euro- and Sterling-denominated securities, but may also invest in securities denominated in other currencies. The Fund is expected to have a high turnover.

The portfolio includes positions based on both long-term and short-term investment ideas. The time horizon for macro more structural or cyclical thematic ideas often have long-term investment horizons, while tactical ideas often have much shorter-term investment horizons.

There is no limit on the duration of individual Fund holdings; however, duration at the Fund level will be limited to the duration of the Index +/- 2 years. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely bond prices will drop as yields increase. For example, a bond with 5 year duration will likely decrease in value by 5% if yields rise 1% and increase in value by 5% if yields fall 1%. If the duration of the Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 4 years, and will not be higher than 8 years.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 0% and 700% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.



### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Literature section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn to the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Long-Short Strategy
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## **DEALING IN SHARES**

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](https://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent
S		USD 1 million	USD 1,000	
T, G		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against other currencies in which the assets of the Fund are denominated (based on the Index weights).

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class G** Shares are reserved for existing Shareholders whose previous Shares have been changed, and serves as a "grandfathered" Class enabling the Shareholders to remain invested without undergoing those changes. This Share Class is closed to investors from outside the Class, and is only available to those investors that were holding Shares in the Fund as at 17 April 2013.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.35%	N/A
T	N/A		N/A	N/A
D	5%		0.35%	0.35%
N	N/A		0.35%	N/A
DL	3%		0.35%	1.10%
G	N/A		0.30%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
Wellington Global Credit ESG Fund

**Legal entity identifier:**  
DVNIEMSUF6LETV826916

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers that do not have the worst E or S Ratings relative to their peer universe. In order to do this, the Fund assigns issuers an individual E and S Rating, based on Wellington Management’s proprietary ratings framework, using a rating scale of 1-5, where 1 is the highest rating, and excludes issuers that have received an E or S Rating of 5. A rating of 1 is the most positive rating, indicating that the company is a leader among its peers in managing material environmental or social risks or incorporating environmental or social factors into its practices. A rating of 5 is the most negative, indicating that the company may be lagging its peers in managing certain material environmental or social risks or incorporating environmental or social factors into its practices. E Ratings use environmental indicators (such as energy efficiency, carbon emissions and pollutants, sustainable packaging and hazardous waste), and S Ratings use social indicators (such as corruption and bribery, labour relations, product safety and supply chain management) in the assessment of the environmental and social activities and attributes of issuers.

Issuers with a below average E or S Rating (E or S Rating of 4) may only be included in the Fund if the Investment Manager determines that the Fund is adequately compensated for the additional risk.

2. Issuers are screened to enable the Fund to apply a number of exclusionary screens in order to exclude or reduce certain harmful impacts on the environment and society. These include avoiding corporate issuers principally involved in the following industries: fossil fuels, thermal coal, controversial and conventional weapons; and will not invest in corporate issuers that do not have responsible practices on human rights, forced labour or do not comply with the United Nations Global Compact; and avoiding corporate issuers that engage in or harmful social activities such as adult entertainment, tobacco and cannabis.

The Fund will not invest in the sovereign debt of countries generating a majority of revenues from fossil fuel

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

exports as well as those that are identified as “not free” in terms of political rights and civil liberties (in addition to the criteria set out in the Exclusion Policy).

3. Issuers with disclosed carbon data that enable the Fund to seek to achieve long term net zero carbon intensity by aiming to reduce its weighted average carbon intensity ("WACI"), as compared to the 2019 WACI of the Custom Bloomberg Global Aggregate Corporate (Fin 40% cap) USD/Euro/GBP 1% Cap \$500M Min Index (ex Tier 1, Upper Tier 2, and Capital Credit securities) Index (the "Index") by 2050.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The number of securities of any corporate issuers involved in the production or mining and sales of fossil fuels, as defined by standard industry classifications for Energy. Since the Fund will exclude such issuers, this number should be 0.

The number of bonds of any countries identified as generating >50% of export revenues from fossil fuels. Since the Fund will exclude such issuers, this number should be 0.

The number of issuers held with an E Rating or S Rating of 5. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers held identified as generating >25% of their revenue from thermal coal energy generation. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers held identified as failing to comply with the United Nations Global Compact. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers identified as having any tie to the manufacturing of controversial or nuclear weapons. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers identified as generating >5% of their revenue from the production of civilian firearms. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers identified as generating >5% of their revenue from adult entertainment. Since the Fund will exclude such issuers, this number should be 0.

The number of corporate issuers identified as producing tobacco or generating >25% of their revenue from tobacco or cannabis related business activities. Since the Fund will exclude such issuers, this number should be 0.

The number of bonds of countries that are identified as "not free" in terms of political rights and civil liberties. Since the Fund will exclude such issuers, this number should be 0.

The percentage difference of the Fund's WACI and that of the Index's 2019 WACI. Since the Fund maintains a WACI that is 25% below the Index's 2019 WACI, with this percentage increasing to 50% by 2030, this percentage is expected to be at least 25% and to increase to at least 50% by 2030.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will maintain a carbon footprint (weighted average carbon intensity) that is lower than the Index. The Fund will aim to reduce its weighted average carbon intensity (“WACI”) to net zero by 2050, or sooner, in line with the Paris Agreement - PAI: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy. In addition the Fund will exclude companies engaged in the production and sales of fossil fuels. - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.
4. The Fund excludes companies which have been identified as failing to comply with the United Nations Global Compact - PAI: Violations of United Nations Global Compact.
5. The Fund excludes companies that are identified as “not free” according to the MSCI’s Freedom House Global Freedom Status - PAIs: Investee countries subject to social violations.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).





## What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager excludes investment in issuers with an E or S Rating of 5, using a rating scale of 1-5, where 1 is the highest rating.

In order to do this, the Investment manager assigns issuers an individual E and S Rating, based on Wellington Management's proprietary ratings framework, using a rating scale of 1-5, where 1 is the highest rating, and excludes issuers that have received an E or S Rating of 5. A rating of 1 is the most positive rating, indicating that the company is a leader among its peers in managing material environmental or social risks or incorporating environmental or social factors into its practices. A rating of 5 is the most negative, indicating that the company may be lagging its peers in managing certain material environmental or social risks or incorporating environmental or social factors into its practices.

E Ratings use environmental indicators (such as energy efficiency, carbon emissions and pollutants, sustainable packaging and hazardous waste), and S Ratings use social indicators (such as corruption and bribery, labour relations, product safety and supply chain management) in the assessment of the environmental and social activities and attributes of corporate issuers.

Issuers with a below average E or S Rating (E or S Rating of 4) may only be included in the Fund if the Investment Manager determines that the Fund is adequately compensated for the additional risk. The Fund will apply this ESG framework to its investment analysis and decisions on at least 90% of the holdings (excluding cash and cash equivalents) with the aim of achieving full coverage over time as the disclosure of ESG information improves. The Fund aims to be fully invested with cash and cash equivalents held on an ancillary basis.

The Investment Manager also applies several binding restrictions including restricting investment in issuers involved in the following industries: fossil fuels, thermal coal, controversial and conventional weapons; or that do not have responsible practices on human rights, forced labour or do not comply with the United Nations Global Compact; or harmful social activities such as adult entertainment, tobacco and cannabis. The Fund will not invest in the sovereign debt of countries generating a majority of revenues from fossil fuel exports as well as those that are identified as "not free" in terms of political rights and civil liberties (in addition to the criteria set out in the Exclusion Policy). These restrictions support certain ESG characteristics, by excluding issuers identified as responsible for significant environmental or social harm around the world. These restrictions may evolve over time and further exclusions may be added in line with the Fund's ESG framework.

The Investment Manager monitors the Fund's WACI compared to the 2019 WACI of the Index and adjusts it over time in order to target net zero emissions by 2050 in alignment with the Paris Agreement.

Subject to any stricter criteria at set out above, the Fund also applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund excludes issuers rated 5 for E or S Rating using a rating scale of 1-5, where 1 is the highest rating and 5 the most negative rating as explained above. Issuers with a below average E or S Rating (E or S Rating of 4) may only be included in the Fund if the Investment Manager determines that the Fund is adequately compensated for the additional risk.

The Fund excludes corporate issuers identified as producing, mining or selling fossil fuels, and bonds of any countries identified as generating >50% of export revenues from fossil fuels.

The Fund excludes corporate issuers identified as generating >25% of their revenue from thermal coal energy generation.

The Fund excludes corporate issuers identified as failing to comply with the United Nations Global Compact.

The Fund excludes corporate issuers identified as having any tie to the manufacturing of controversial or nuclear weapons.

The Fund excludes corporate issuers identified as generating >5% of their revenue from the production of civilian firearms.

The Fund excludes corporate issuers identified as generating >5% of their revenue from adult entertainment.

The Fund excludes corporate issuers identified as producing tobacco or generating >25% of their revenue from tobacco or cannabis related business activities.

The Fund will not invest in the debt of countries that are identified as “not free” in terms of political rights and civil liberties.

The Fund will have a WACI that is no less than 50% below the Index’s 2019 WACI by 2030 and aim to achieve net zero by 2050. As an interim milestone, the Investment Manager is committed to limit the Fund’s contribution to climate change by targeting a WACI that is at least 25% less than the Index’s 2019 WACI baseline as it transitions towards its 2030 and 2050 carbon reduction goals as specified above.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**What is the asset allocation planned for this financial product?**

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund’s net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund’s ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund’s ability to attain its environmental or social characteristics.

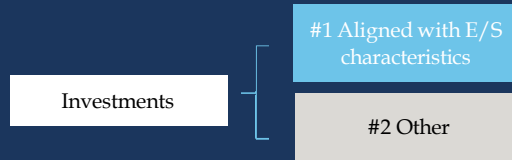
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

*How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



*To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

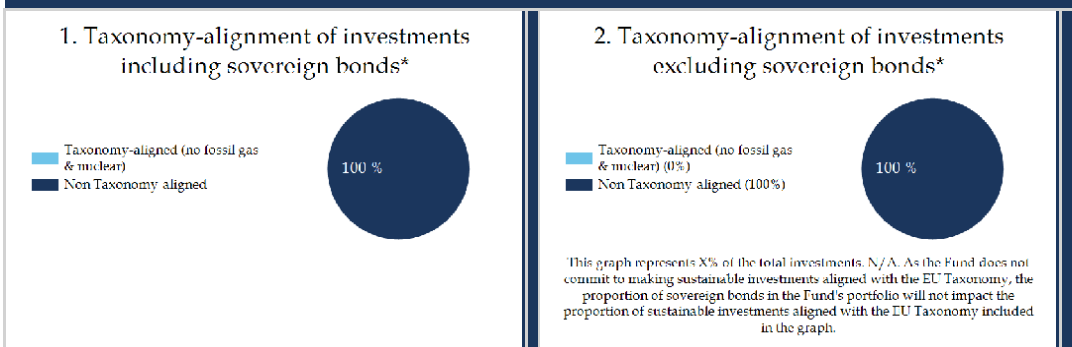
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

*Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas
- In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

*What is the minimum share of investments in transitional and enabling activities?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



*What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?*

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000040\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000040)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Health Care Equity Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Health Care Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI World Health Care Index (the "Index") and achieve the objective, primarily through investment in the equity securities of health care companies worldwide.

The Fund's investment approach is based primarily on bottom-up fundamental research conducted by the global health care analysts in the Investment Manager's Global Industry Analyst group. The Fund takes a long-term value approach to investing in fundamentally sound companies and will shift opportunistically among health care sub-sectors such as medical products, health services, major pharmaceuticals, specialty major pharmaceuticals, and specialty pharmaceuticals (e.g. genetic, biotech and animal). Sub-sector weightings are primarily a residual of the stock selection process. The Investment Manager believes that scientific research and development is central to the fundamental performance of biopharmaceutical and medical products companies, while the fortunes of service-oriented health care companies are largely the result of management skill. Key factors for bottom-up security analysis are company business prospects, new product outlook, corporate strategy, and competitive position.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index

is designed to capture the performance of Health Care sector securities in the large and mid-cap segments across developed markets. This Index does not take into account the social characteristics referenced above.

The Fund will invest, either directly or indirectly through the use of FDIs, in equity securities or other securities with equity characteristics such as preferred stocks, warrants on equities, as well as depository receipts for such securities (ADRs traded in the United States markets and GDRs traded in markets in other countries), issued by companies active in the health care area worldwide. These investments may be made in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund generally will not initiate new positions in the smallest market capitalisation companies in the health care sector. The market capitalisation floor for the Fund will typically be in the range of USD 1 billion to USD 1.5 billion but may fluctuate outside this range as market conditions shift over time. The securities of some medium and small companies, and securities of companies in countries with less well-developed economies and securities markets, are likely to be less liquid than those of large companies in developed markets.

The Fund will be well diversified by issuer. The Fund will be fully invested, with cash and cash equivalent holdings kept to a minimum and held for ancillary liquid asset purposes only. The maximum holding in any one company will be 10% of the Fund's Net Asset Value at any time. Investments in securities of companies located outside the United States will typically comprise 10% to 50% of the Fund's Net Asset Value. These non-US holdings may be representative of a broad range of non-US markets. No more than 20% of the Fund's Net Asset Value will be invested in markets which the Investment Manager considers to be emerging markets. Fund turnover is expected to be low to moderate. The Fund may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund's variability of return is expected to be very high, well above that of a more broadly diversified, global equity Fund. The Fund is suitable as an investment in a well-diversified portfolio.



### Exposure to Securities Financing Transactions ("SFTs")

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### German Taxation

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

### GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com;

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Class DL Shares will commence on 23 April 2024 and close on 22 October 2024.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Equity
- Financial Derivatives Instruments
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	or
T, G		USD 5 million		
UN		USD 750 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class G** Shares are reserved for existing Shareholders whose previous Shares have been changed, and serves as a “grandfathered” Class enabling the Shareholders to remain invested without undergoing those changes. The G Class is only available to those investors that were holding Shares in the Fund as at 31 December 2005.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class UN** Shares are reserved for certain investors, acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee. No distribution fee is paid in respect of the Class UN Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

## **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		1.25%	N/A
T	N/A		N/A	N/A
D	5%		1.25%	0.65%
N	N/A		1.25%	N/A
G	N/A		0.75%	N/A
DL	3%		1.25%	1.65%
UN	N/A		Up to 1.25%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, DL and UN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Global Health Care Equity Fund**

**Legal entity identifier:**  
**BIN54GDXNDVZ6CYZUZ36**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet the following social characteristic.

The Fund will encourage the creation of new therapies and addressing unmet medical needs by favouring companies with higher research and development expense to sales ratios than the MSCI World Health Care Index (the "Index"). Companies with a research and development expense to sales ratio ("R&D-to-sales ratio") is used to calculate the Fund's overall R&D-to-sales ratio and maintain an overall weighted R&D-to-sales ratio that is at least two times greater than the Index.

Whilst the Index is used for R&D-to-sales ratio comparison, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The relative ratio of the Fund's weighted average R&D-to-sales ratio and that of the Index.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the weighted average R&D-to-sales ratio of the companies and ensures it remains better than that of the Index.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average R&D-to-sales ratio at least two times that of the Index.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 51% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.



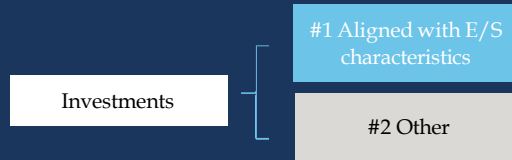
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

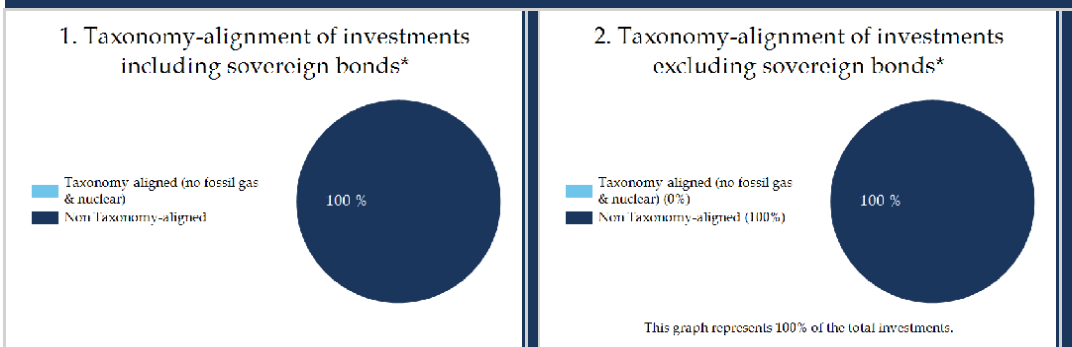
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not



significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for R&D-to-sales ratio comparison, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000042\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000042)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global High Yield Bond Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global High Yield Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the ICE Bank of America Global High Yield Constrained Index (the "Index") and achieve the objective by investing primarily in debt securities worldwide which are considered by the Investment Manager to be below investment grade.

The Fund's investment approach is based on analysis of the credit profile of individual high yield issuers combined with an analysis of the behavior and performance of the broader economic environment. Total returns will be sought through income and capital appreciation.

The Investment Manager seeks to generate excess returns over the long term by:

- Adjusting portfolio positioning through increasing or reducing the risk of the portfolio depending on its view of the current environment;
- Exploiting inefficiencies in how the market has priced the risk of defaults;
- Incorporating ideas from multiple research sources; and
- Seeking total return opportunities through both income and/or capital appreciation.

The investment process is implemented through the dynamic interaction of the following components:

- 1) **Broad Strategy:** The Investment Manager systematically assesses the environment for high-yield bonds, in looking to set the overall risk positioning of the Fund relative to the Index as well as identifying sectors that are experiencing long-term change. Furthermore, the Investment Manager will also overweight/underweight geographic regions relative to the Index by assessing various inputs, including macroeconomic forecasts, market valuations and market expectations. The implementation of these top-down strategies is contingent on being able to source investments that reflect these ideas.
- 2) **Research "best ideas":** The Investment Manager maintains financial models for each security within the investment universe and leverages these for stock recommendations. High yield credit analysts work closely with their equity and investment grade bond credit research counterparts, which results in a more holistic view of individual issuers and sectors.
- 3) **Portfolio Construction:** The Investment Manager looks to construct a Fund that is well diversified by industry but also able to take advantage of favourable industry trends. The portfolio will be constructed in a manner consistent with the Investment Manager's credit opinions, top-down sector views, relative value analysis (comparing securities across sectors and geographies) and portfolio risk analysis.
- 4) **Risk Management:** The Investment Manager has a disciplined approach to risk management, leveraging proprietary risk systems to analyse and manage the risk of the Fund. Two key tenets of the Fund construction philosophy are diversification and ensuring larger position sizes in securities are linked to the strength of conviction in the investment opportunity.

## Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### Social

- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison and weighted carbon intensity purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how industry, currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index tracks the performance of below investment grade corporate debt publicly issued in markets around the world and is modified capitalisation weighted, with the largest issuers capped at 2% of the weight of the total index with the excess weight redistributed equally amongst the issuers under that cap. The Index does not take into account the environmental and social characteristics referenced above.

The Fund may hold debt securities denominated in US Dollars or other currencies. The Investment Manager may employ currency hedging through the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, to bring the Fund's currency exposures closer to those of the Index. The Fund is expected to have currency exposures that are similar to the Index.

The Fund will invest, either directly or indirectly (both long and short) through the use of FDIs, in high yield (i.e., below investment grade) debt securities of issuers domiciled around the world for investment purposes and for efficient portfolio management, including hedging against risk. The Fund may invest up to 5% of its Net Asset Value in securities traded in the Russian markets. The Fund may invest in a broad range of debt securities of various types and maturities issued by commercial, governmental or supranational entities, including, for example, debentures, loan participation securities that qualify as an eligible investment by the Fund that reference bank loans or trade finance loans, loans assignments that qualify as Money Market Instruments, real estate investment trust debt securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law),

convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event preferred stock, warrants, rights, floating rate and variable rate notes, collateralised debt obligations and collateralised loan obligations, collateralised securities (such as securities collateralised or backed by mortgages or credit card receivables), coupon-bearing and deferred interest instruments (such as zero coupon bonds). The Fund may purchase or receive equity or equity-related securities in connection with a restructuring or workout of a prior or existing fixed income investment. These include common stock, inclusive of public and private equity, preferred stock or securities that may be converted into or exchanged for common stock, known as convertible securities, like rights and warrants. The Fund may also invest in debt securities of corporations issued under Rule 144A or Regulation S under the US Securities Act of 1933.

The Fund will primarily invest in debt securities rated below investment grade, i.e. below Baa3 by Moody's, BBB- by Standard & Poor's, or BBB- by Fitch. The Fund may also invest in non-rated debt instruments deemed to be of similar credit quality by the Investment Manager. The average quality of the Fund's holdings will tend to be in the B2/B range but is expected to fluctuate. In case a security has two different ratings, the lower rating shall be decisive. In case of three or more different ratings, the lower rating of the two best ratings shall be decisive.

If a security is unrated, then an equivalent credit rating, as deemed by the Investment Manager, may be used. In the event that a security is downgraded after its purchase, the Investment Manager may continue to hold such security on behalf of the Fund if it determines that it is in the best interest of the Fund. The Fund may hold equity securities, up to 5% of the market value of the Fund, if such securities are received as a result of a corporate restructuring or as a result of owning equity-linked securities (e.g. convertible bonds, warrants).

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

There is no limit on the duration of individual Fund holdings. Duration at the Fund level is expected to be within the duration of the Index +/- 1 years although it may be outside of these limits from time to time. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 5 years, and will not be higher than 7 years.

The Fund will generally be diversified by country, currency, sector and issuer and may have greater than 20% exposure to securities issued by issuers located in what the Investment Manager considers to be emerging markets, including Russia. The Fund is expected to hold between 100-200 issuers and to have a low turnover.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds**, and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 80% and 120% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

The Fund may invest in derivatives as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.



## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against other currencies in which the assets of the Fund are denominated (based on the Index weights).

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee of up to 1.30% of the Net Asset Value attributable to the Class DL Shares attributable to Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.45%	N/A
T	N/A		N/A	N/A
D	5%		0.45%	0.45%
N	N/A		0.45%	N/A
DL	3%		0.45%	1.10%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
Wellington Global High Yield Bond Fund

**Legal entity identifier:**  
DBV0DBJPDIXDTNXFJP47

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet one or more of the following environmental characteristics.

1. Issuers with disclosed carbon data that enable the Fund to limit the overall impact of the portfolio on climate change relative to the investment universe by maintaining a lower weighted average carbon intensity ("WACI") than the ICE Bank of America Global High Yield Constrained Index (the "Index").
2. Issuers are screened to enable the Fund to exclude investment in any securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage difference of the Fund's WACI and that of the Index's.

The number of corporate issuers held that generate more than 25% of their revenue from thermal coal energy generation identified using a combination of third party and/or internal Wellington Management analysis.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will maintain a carbon footprint (weighted average carbon intensity) that is lower than the Index. PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental characteristics promoted by the Fund is described below.

The Investment Manager monitors the Fund's WACI compared to that of the Index and adjusts it so that it remains at least 25% lower than the Index.

The Fund excludes the securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).

Subject to any stricter criteria at set out above, the Fund also applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund maintains a WACI that is at least 25% lower than the Index.

The Fund excludes the securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 60% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

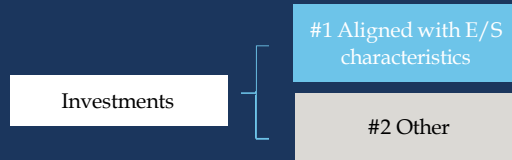
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

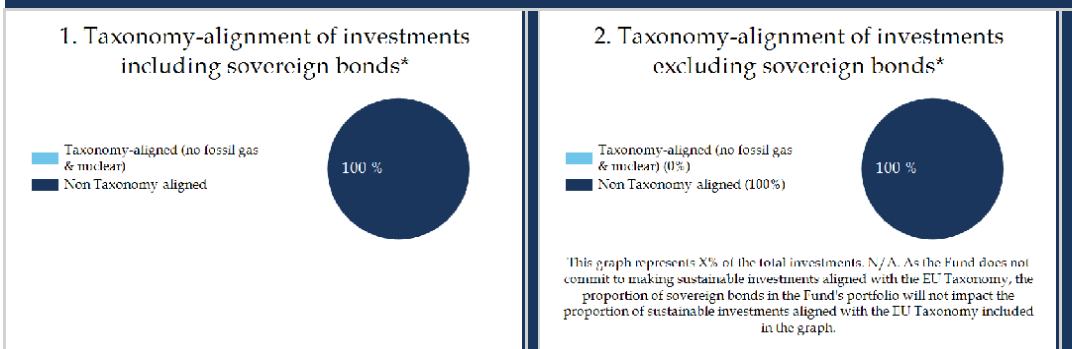
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not



significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for EPM, and/or hedging, and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental characteristics.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000043\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000043)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Global Perspectives Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Perspectives Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI All Countries World Small Cap Index (the "Index") and achieve the objective by investing globally, primarily in small to mid-capitalisation companies with a market capitalisation of typically below \$10bn at the time of initial purchase.

The Investment Manager follows a multi-disciplinary investment process for selecting stocks. A macroeconomic assessment is used in conjunction with a quantitative model which looks at factors such as fair value, earnings quality, risks and transaction costs to narrow the investment universe. Fundamental bottom-up stock picking is then used by the Investment Manager to construct the final Fund.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how security weightings differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total

returns in excess of the Index and/or performance that is materially different from the Index. The Index is a market capitalisation weighted index designed to measure equity market performance of smaller companies in both developed and emerging markets.

The Fund will invest either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, warrants, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies. The Fund may also hold interests in master limited partnerships as described in the section of the Prospectus entitled **Master Limited Partnerships** and securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in developed countries and any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may make a limited investment in securities traded on Russian markets and may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**). The Fund will be well diversified by country, currency, industry and issuer but may hold positions that are concentrated in this manner from time to time.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising the market access products mentioned above as well as index futures and currency forward contracts to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally, less than 5% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review

this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or)
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N, DL	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.



**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Preliminary Charge*</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
S	N/A	0.90%	N/A
T	N/A	N/A	N/A
D	5%	0.90%	0.90%

N	N/A	0.90%	N/A
DL	3%	0.90%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
Wellington Global Perspectives Fund

**Legal entity identifier:**  
549300SQDCZ1HDC9H010

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet the following environmental or social characteristics.

The Fund will invest in companies and REITs with average or above-average ESG Rating relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's net assets invested in companies with an ESG Rating of 1-3.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager will invest a minimum percentage of the Fund's net assets in companies with an ESG Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest at least 70% of the Fund's net assets in companies with an ESG Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

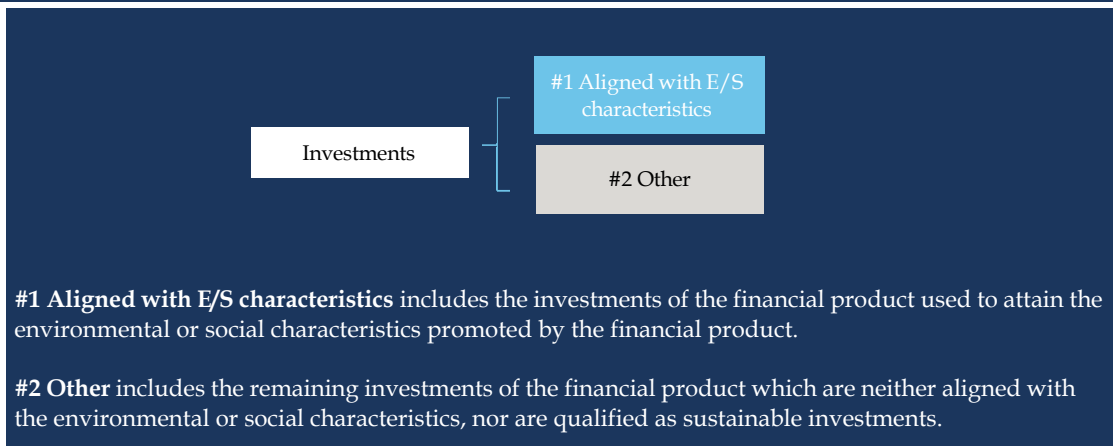
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities are** activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000045\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000045)%26languageCd=EN&recentMatch=true&download=true)



The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

Dated 22 April 2024

### Wellington Global Property Fund

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Property Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund seeking to outperform the FTSE EPRA/NAREIT Developed Index (the “Index”) and achieve the objective through investment primarily in companies and/or real estate investment trusts (“REITs”), globally, with activities in or related to the development, operation, service and/or ownership of real estate, such as homebuilders, lodging, multi-family housing, retail real estate, office properties and property service companies. The Fund may also invest in other issuers that have a significant exposure to real estate through ownership of real estate assets.

The Investment Manager's approach is based on independent, bottom-up, fundamental research combined with top-down analysis of the real estate market. The Investment Manager uses financial analysis and an evaluation of individual competitive position to identify companies with the most attractive characteristics. Using insights from global industry analysts within its research department, the Investment Manager combines the above company analysis with forecasts and research on potential tenant demand, creating what it believes is a unique tenant-driven process that provides a differentiated perspective relative to global real estate markets. These insights may include, for example, the analysts' views on changing business models, tenant expansion plans and creditworthiness. The Fund typically invests in companies that possess what the Investment Manager believes to be attractive valuation metrics (based on company cash flows and distribution yield, relative spread between public and private investment and internal rate of return), management teams with a disciplined investment strategy, an ability to deliver high levels of same-unit rent growth and occupancy relative to the real estate market, and a strong and flexible balance sheet in terms of the ability to fund future external growth and increase distributions. Top-down analysis is based on three broad components: macroeconomic trends (those affecting supply and demand for real estate within regions, such as population and employment growth and construction activity), implied valuation from capital markets (return expectations of companies across broad equity and fixed income markets), and private real estate market trends (understanding the impact private markets investments have on public real estate companies). Typically, the Investment Manager's geographic and sector weightings are most influenced by the bottom-up stock selection process, though they are also impacted by the top-down evaluation of the real estate market.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Investment Manager believes that being disciplined regarding capital allocation is crucial to creating value in the real estate sector because REITs are obligated to distribute a percentage of their income to shareholders through distributions and are thus reliant on the debt and equity markets to fund growth. Accordingly, they can destroy or create more value through capital allocation, relative to how they operate the properties. As such, the Investment Manager has a focus on management incentives to make sure they are aligned with capital allocation strategies and growing shareholder value.

The Index may be considered during portfolio construction and is used for performance comparison purposes. The Index is designed to track the performance of listed real estate companies and REITs worldwide. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how regional and security weightings differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index.

The Fund will invest, directly or through FDIs, in the following instruments in pursuit of the Fund's investment objective: equity securities or securities with equity characteristics which comprise preferred stock, rights and warrants on equities issued by either REITs or the issuers described above as well as depository receipts (such as ADRs, GDRs and European Depository Receipts) and market access products (including warrants on equities, options on equities and equity swaps). It is expected that the Fund will invest predominantly in securities issued by developed market issuers but may also invest in securities issued by issuers located in what the Investment Manager considers to be emerging markets. The Fund may invest in securities across the market capitalisation spectrum, and may have exposure to various currencies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)). The Fund may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

As an alternative means of gaining exposure to the markets and instruments listed above, the Fund may invest in exchange traded funds which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and exchanges as set out in Appendix I of the Prospectus and may be transferable securities or collective investment schemes.

The Fund will invest in developed countries and may invest up to 20% in countries which are considered to be emerging markets by the Investment Manager. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising equity options, index futures and options on futures and currency forwards to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Funds use of derivatives will be for the purpose of hedging in accordance with the purposes set out below.

1. For the purpose of realizing the same amount of profit or loss of assets that are the investment targets of the Fund; or
2. For the purpose of minimizing risks (the increase or decrease of profits and losses due to factors such as foreign exchange rate fluctuations, interest rate fluctuations, and changes in economic conditions) arising from price fluctuations and interest rate fluctuations pertaining to the assets or liabilities of the Fund; or
3. For the purpose of minimizing risks arising from foreign exchange rate fluctuations for the assets or liabilities of the Fund through foreign exchange futures trades.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally, less than 10% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this

is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Quarterly Distributing Shares will commence on 23 April 2024 and close on 22 October 2024.

## RISK FACTORS

Potential investors' attention is drawn to the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Liquidity
- Market
- Operational Risk
- Real Estate Investment Trusts
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.60%	N/A
T	N/A		N/A	N/A
D	5%		0.60%	0.60%
N	N/A		0.60%	N/A
DL	3%		0.60%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Global Property Fund

**Legal entity identifier:**  
549300UXH73I5SQXTB82

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet the following environmental characteristics.

The Fund will invest in companies and REITs with average or above-average E Rating relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's net assets invested in companies and REITs with an E Rating of 1-3.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager will invest a minimum of 75% of the Fund's net assets in companies and REITs with an E Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest in companies and REITs with an E Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 75% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

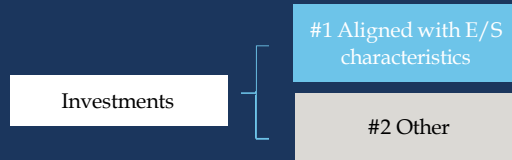
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

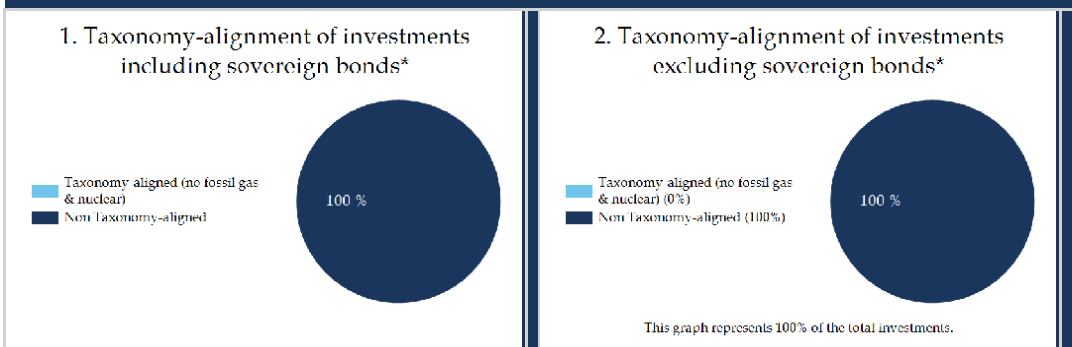
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000620\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000620)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Higher Quality Global High Yield Bond Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Higher Quality Global High Yield Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the ICE Bank of America Global High Yield Constrained BB-B Index (the "Index") and to achieve the objective by investing primarily in debt securities worldwide which are considered by the Investment Manager to be rated BB1 through B3 inclusive.

The Fund's investment approach is based on analysis of the credit profile of individual high yield debt issuers, as well as the analysis of the behaviour and performance of the broader economic environment. Total returns will be sought through income and capital appreciation.

The Investment Manager seeks to generate returns over the long term by:

- Adjusting portfolio positioning through increasing or reducing the risk of the portfolio depending on the view of the current environment;
- Exploiting inefficiencies in how the market has priced the risk of defaults;
- Incorporating ideas from multiple research sources; and
- Seeking total return opportunities through both income and/or capital appreciation.

The investment process is implemented through the dynamic interaction of the following components:

- 1) **Broad Strategy:** The Investment Manager systematically assesses the environment for high-yield bonds, in looking to set the overall risk positioning of the Fund relative to the Index, as well as identifying sectors that are experiencing long-term change. Furthermore, the Investment Manager will also overweight/underweight geographic regions relative to the Index by assessing various inputs, including macroeconomic forecasts, market valuations and market expectations. The implementation of these top-down strategies is contingent on being able to source investments that reflect these ideas.
- 2) **Research "best ideas":** The Investment Manager maintains financial models for each security within the investment universe and leverages these for stock recommendations. High yield credit analysts work closely with their equity and investment grade bond credit research counterparts, which results in a more holistic view of individual companies and sectors.
- 3) **Portfolio Construction:** The Investment Manager looks to construct a portfolio that is well diversified by industry but also able to take advantage of favourable industry trends. The portfolio is constructed in a manner which is consistent with the Investment Manager's credit opinions, top-down sector views, relative value analysis (comparing securities across sectors and geographies) and portfolio risk analysis.
- 4) **Risk Management:** The Investment Manager has a disciplined approach to risk management, using internally developed risk systems to analyse and manage the risk of the Fund. Two key tenets of the Fund construction philosophy are diversification and ensuring larger position sizes in securities are linked to the strength of conviction in the investment opportunity.



## Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### Social

- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison and weighted average carbon intensity purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how industry, currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index does not take into account the environmental and social characteristics referenced above.

The Index tracks the performance of below investment grade corporate debt publicly issued in markets around the world comprising securities rated BB1 through B3 inclusive, based on a composite of Moody's and S&P and is modified capitalisation weighted, with the largest issuers capped at 2% of the weight of the total index with the excess weight redistributed equally amongst the issuers under that cap.

The Fund will invest, either directly or indirectly (both long and short) through the use of FDIs, in high yield (i.e., below investment grade) debt securities of issuers domiciled around the world for investment purposes and for efficient portfolio management, including hedging against risk. The Fund may invest in a broad range of debt securities of various types and maturities issued by commercial, governmental or supranational entities, comprising debentures, loan participation securities that qualify as an eligible investment by the Fund that reference bank loans or trade finance loans, bank loan assignments that qualify as Money Market Instruments, real estate investment trust debt securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, preferred stock, warrants, rights, floating rate and variable rate notes, collateralised debt obligations and collateralised loan obligations, collateralised securities (such as

securities collateralised or backed by mortgages or credit card receivables), coupon-bearing and deferred interest instruments (such as zero coupon bonds) or any other securities, issuers and security types represented in the Index. The Fund may purchase or receive equity or equity-related securities in connection with a restructuring or workout of a prior or existing fixed income investment. These include common stock, inclusive of public and private equity, preferred stock or securities that may be converted into or exchanged for common stock, known as convertible securities, like rights and warrants. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)) and equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

There is no limit on the duration of individual Fund holdings. Duration at the Fund level is expected to be within the duration of the Index +/- 1 years although it may be outside of these limits from time to time. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 5 years, and will not be higher than 7 years.

The Fund may hold debt securities denominated in US Dollars or other currencies. The Investment Manager may employ currency hedging through the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, to bring the Fund's currency exposures closer to those of the Index. The Fund is expected to have currency exposures that are similar to the Index.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising interest rate futures, interest rate swaps, credit default swaps, index credit default swaps, currency forwards and forward rate agreements, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund will generally be diversified by country, currency, sector and issuer and may have greater than 20% exposure to securities issued by issuers located in what the Investment Manager considers to be emerging markets, including Russia. The Fund is expected to hold between 100-200 issuers and to have a low turnover.

Investments will be drawn from the broad credit spectrum. The Fund may acquire securities, if rated at least investment grade, i.e. Baa3 by Moody's, BBB- by S&P, or BBB- by Fitch, or an equivalent internal rating by the Investment Manager. High-yield securities may be acquired if they have a rating of at least speculative grade, i.e. B3 by Moody's, B- by S&P, or B- by Fitch, or an equivalent internal rating by the Investment Manager. In case of two different ratings, the lower rating shall be decisive. In case of three or more different ratings, the lower rating of the two best ratings shall be decisive. The Investment Manager will under no circumstances rely exclusively or automatically on external ratings in determining the credit

risk of a financial instrument, and in addition the Investment Manager will perform its own credit assessment with respect to each investment. Any securities which fall below the minimum required rating following purchase may continue to be held, provided that any such downgraded securities do not in aggregate exceed 3% of the Net Asset Value of the Fund. Otherwise, they will be sold within six months from the downgrading, unless the rating is upgraded within that period.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 80% and 120% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

Short positions may only be taken through financial derivative instruments ("FDIs") for investment purposes or for hedging risk. The gross exposure of the Fund's short positions for investment purposes is not expected to exceed 10% of the Net Asset Value of the Fund.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
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Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com.

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not

more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent USD or
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against other currencies in which the assets of the Fund are denominated (based on the Index weights).

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.40%	N/A
T	N/A		N/A	N/A
D	5%		0.40%	0.40%
N	N/A		0.40%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Higher Quality Global High Yield Bond Fund

**Legal entity identifier:**  
5493008P462PNCNR5B36

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers with disclosed carbon data that enable the Fund to limit the overall impact of the portfolio on climate change relative to the investment universe by maintaining a lower weighted average carbon intensity - "WACI") than the ICE Bank of America Global High Yield Constrained BB-B Index (the "Index").
2. Issuers are screened to enable the Fund to exclude investment in securities of any corporate issuer that generate more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).
3. Issuers are screened to enable the Fund to exclude investment in corporate issuers that generate more than 5% of their revenue from adult entertainment.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage difference of the Fund's WACI and that of the Index's.

The number of corporate issuers held that generate more than 25% of their revenue from thermal coal energy generation identified using a combination of third party and/or internal Wellington Management analysis.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The number of issuers held that generate more than 5% of their revenue from adult entertainment identified using a combination of third party and/or internal Wellington Management analysis.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will maintain a carbon footprint (weighted average carbon intensity) that is lower than the Index. PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund’s exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the Fund's WACI compared to that of the Index and adjusts it so that it remains at least 25% lower than the Index.

The Fund excludes securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy)..

The Fund excludes corporate issuers that generates more than 5% of their revenue from adult entertainment.

Subject to any stricter criteria at set out above, the Fund also applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund maintains a WACI that is at least 25% lower than the Index.

The Fund excludes the securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation.

The Fund will not invest in any issuer that generates more than 5% of their revenue from adult entertainment.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

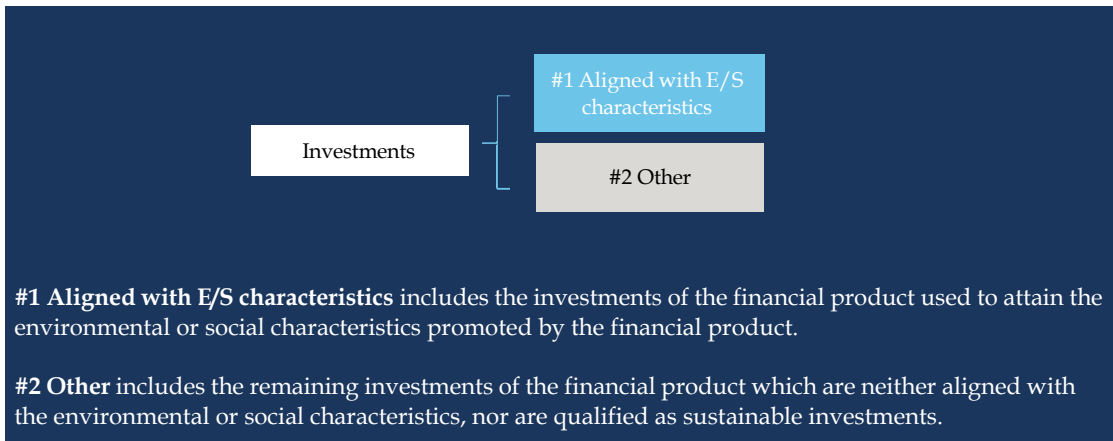
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 60% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

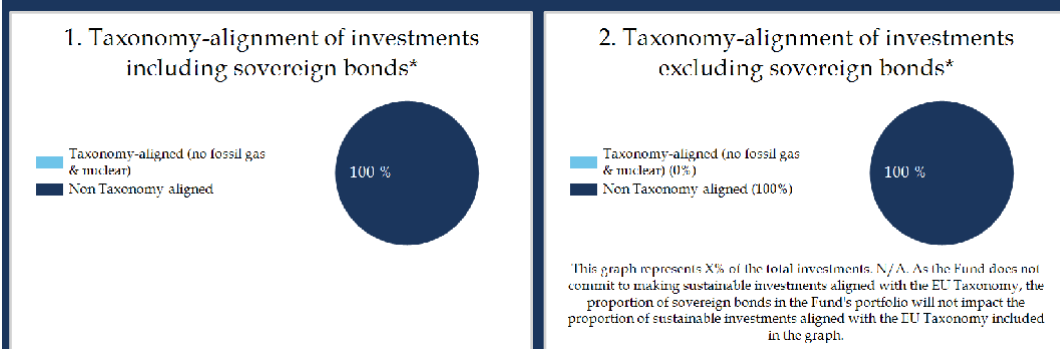
- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for EPM, and/or hedging, and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



**Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000647\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000647)%26languageCd=EN&recentMatch=true&download=true)



The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Sterling Core Bond Plus Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Sterling Core Bond Plus Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the ICE Bank of America Sterling Broad Market Index (the "Index") and achieve the objective, investing primarily in sterling denominated fixed income debt securities. The Fund combines a core of sterling fixed income assets combined with a range of global fixed income and currency strategies, including global interest rates, investment grade corporate bonds, global high yield bonds or sovereign bonds. As the Fund has a sterling benchmark, the Investment Manager aims to generate returns by using the widest fixed income opportunity set in conjunction with a majority of sterling assets.

The Fund draws on multiple sources of potential return to seek to meet its investment objective:

- **Macroeconomic Analysis.** A strategy which uses research-driven fundamental, macroeconomic or top-down analysis of the broader economic and/or political environment, to tactically manage interest rate and currency exposures at the country level. Macro investment ideas are expressed on a currency hedged basis through strategies such as developed market duration (price sensitivity to fluctuations in interest rates) and country allocations, and on an unhedged basis through currency strategies.
- **Quantitative Analysis.** The Fund uses a systematic approach, which consists of two components: developed market interest rate strategies and crossover sovereign strategies (seeking to invest when a country is on the cusp of a significant event which may lead to large market reversals or changes).
- **Credit Analysis.** The Investment Manager aims to generate returns through bottom-up security selection. Credit investment ideas are expressed on a currency hedged basis through allocations to investment-grade corporate, high yield, and securitized investment securities.

The Investment Manager also employs a risk monitoring process with the objective of identifying unintended areas of concentration which might result in the Fund performing in an unanticipated way. The goal of this analysis is to ensure that the assumptions made throughout the investment process are examined at the individual security, strategy, and overall Fund level and to anticipate when any assumptions made by the Investment Manager may need to be revised.

The assessment of Sustainability Risks through the analysis of environmental, social and governance ("ESG") factors is part of the Fund's investment process as, in the Investment Manager's view, Sustainability Risks can materially affect an issuer's financial performance and competitiveness.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### Social

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index is a measure of the total return of fixed income securities issued in sterling. The Index includes sovereign and corporate issuance.

The Fund will invest, either directly or indirectly (both long and short) through the use of FDIs, in debt securities denominated in sterling, for investment purposes and for efficient portfolio management, including hedging against risk. The investment approach combines a base of sterling fixed income strategies with an overlay of global best ideas from the global fixed income and currency markets. The Fund may buy and sell bonds issued by sovereign, agency, and supranational issuers, mortgage, commercial mortgage, and asset-backed securities, convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event <sup>warrants</sup>, corporate and real estate investment trust debt loan participations, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations) and, in addition, bank loan assignments that qualify as Money Market Instruments, trade finance loans, credit-linked, index-linked, and capital securities (securities that combine the features of corporate bonds and preferred stock), as well as other debt securities issued by public or private issuers, both fixed and floating-rate, including forward contracts on such securities. These debt securities may be denominated in sterling or other currencies. The Fund may also hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will typically be positive, meaning that long positions will generally be in greater proportion than synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 0% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis

of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The Fund's weighted average credit quality, including cash and cash equivalents, is expected to be A3 by Moody's or A by Standard & Poor's or higher. There is no minimum credit rating for individual securities or currencies.

The Fund generally will be diversified by country, currency, issuer, and investment strategy, but may hold concentrated positions from time to time. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**).

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 50% and 800% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of the FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** GBP;

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not

more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at <https://www.wellington.com> and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S	USD 1 million	USD 1,000
T	USD 5 million	
D, N	USD 5,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Charge*</b>	<b>Preliminary</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
-------------------------	------------------------	--------------------	----------------------------------	-------------------------

S	N/A	0.30%	N/A
T	N/A	N/A	N/A
D	5%	0.30%	0.30%
N	N/A	0.30%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Sterling Core Bond Plus Fund

**Legal entity identifier:**  
6HEUCIAY9HUUBKL34B23

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers that are screened to enable the Fund to limit its exposure to sovereign issuers whose fossil fuels exports represent a significant portion of their total exports.
2. Issuers with an E or S Rating to enable the Fund to exclude investment in the worst rated corporate issuers with the worse E or S Ratings relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in sovereign issuers where fossil fuels make up more than 67% of their exports.

The number of corporate issuers held with an E Rating or S Rating of 5.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

- The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
- The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund restricts its investment in sovereign issuers where fossil fuels make up more than two-thirds (67%) of exports to a maximum percentage of the Fund's NAV.

The Fund excludes investment in corporate issuers with an E or S Rating of 5, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund restricts investment in sovereign issuers where fossil fuels make up more than 67% of their exports to a maximum of 1.5% of the Fund's NAV.

The Fund excludes corporate issuers rated 5 for E or S Rating using a rating scale of 1-5, where 1 is the highest rating.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 65% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

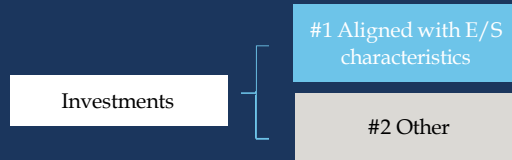
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

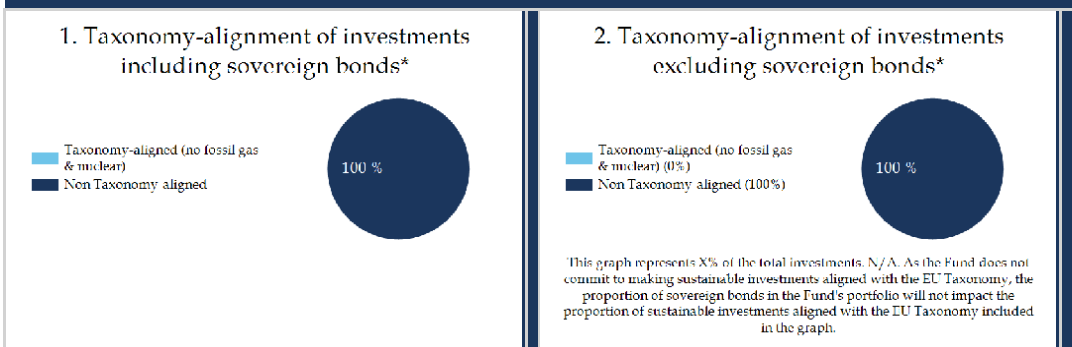
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.

However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000050\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000050)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

Dated 22 April 2024

### Wellington US\$ Core High Yield Bond Fund

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington US\$ Core High Yield Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the ICE Bank of America US High Yield Constrained Index (the "Index"), primarily through investment in debt securities of US corporations which are considered by the Investment Manager to be below investment grade. The Fund's investment approach is based on analysis of the credit profile of individual high yield issuers, as well as the analysis of the behaviour and performance of the broader economic environment.

The Investment Manager seeks to generate returns over the long term by:

- Adjusting portfolio positioning through increasing or reducing the risk of the portfolio depending on the view of the current environment;
- Exploiting inefficiencies in how the market has priced the risk of issuers defaulting;
- Incorporating ideas from multiple research sources; and
- Seeking total return opportunities through both income and/or capital appreciation.

The investment process is implemented through the dynamic interaction of the following components:

- 1) **Broad Strategy:** The Investment Manager systematically assesses the environment for high-yield bonds, in looking to set the overall risk positioning of the Fund relative to the Index, as well as identifying sectors that are experiencing long-term change. The implementation of this top-down strategy is contingent on being able to source investments that reflect these ideas.
- 2) **Research "best ideas":** The Investment Manager maintains financial models for each security within the investment universe and leverages these for stock recommendations. High yield credit analysts work closely with their equity and investment grade bond credit research counterparts, which results in a more holistic view of individual companies and sectors.
- 3) **Portfolio Construction:** The Investment Manager looks to construct a portfolio that is well diversified by industry but also able to take advantage of favourable industry trends. The portfolio is constructed in a manner which is consistent with the Investment Manager's credit opinions, top-down sector views, relative value analysis (comparing securities across sectors and geographies) and portfolio risk analysis.
- 4) **Risk Management:** The Investment Manager has a disciplined approach to risk management, using internally developed risk systems to analyse and manage the risk of the Fund. Two key tenets of the Fund construction philosophy are diversification and ensuring larger position sizes in securities are linked to the strength of conviction in the investment opportunity.

### Sustainability Risks Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change



- i. Implied temperature risk (ITR)
- ii. Greenhouse gas emissions (WACI)

#### **Social**

- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison and weighted average carbon intensity purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how industry, currency and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index tracks the performance of US Dollar denominated below investment grade corporate debt publicly issued in the US domestic market. The Index is modified capitalisation weighted, with the largest issuers capped at 2% of the weight of the total index with the excess weight redistributed equally amongst the issuers under that cap. The Index does not take into account the environmental and social characteristics referenced above.

The Fund will primarily invest, either directly or indirectly (both long and short), in high yield (i.e., below investment grade) debt securities denominated in US Dollars for investment purposes and for efficient portfolio management, including hedging against risk. The Fund may invest in a broad range of debt securities of various types and maturities issued by commercial, governmental or supranational entities, including, for example, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations), real estate investment trust debt securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event and, in addition, bank loan assignments that qualify as Money Market Instruments, debentures, leveraged loans, convertible bonds, preferred stock, warrants, rights, floating rate and variable rate notes, collateralised securities (such as securities collateralised or backed by mortgages or credit card receivables) coupon-bearing and deferred interest instruments (such as zero coupon bonds). The Fund may purchase or receive equity or equity-related securities in connection with a restructuring or workout of a prior or existing fixed income investment. These include common stock, inclusive of public and private equity, preferred stock or securities that may be converted into or exchanged for common stock, known as convertible securities, like rights and warrants. The Fund may invest in US Treasury or agency securities and cash equivalent securities as described in the section of the Prospectus entitled **Cash and Cash Equivalents**. The Fund may

also invest in debt securities of corporations issued under Rule 144A or Regulation S under the US Securities Act of 1933. The Fund will not invest in below investment grade emerging market debt securities.

The Fund will invest primarily in securities listed or traded in United States over-the-counter markets. The Fund will not invest in securities listed or traded in emerging markets. For the purposes of this Fund, an emerging market is one that the Investment Manager considers to be an emerging market. The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

There is no limit on the duration of individual Fund holdings. Duration at the Fund level is expected to be within the duration of the Index +/- 1 years although it may be outside of these limits from time to time. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 5 years, and will not be higher than 7 years.

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I and regulated as UCITS or as AIF ETFs.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 80% and 120% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

The Fund will primarily invest in debt securities rated below investment grade, i.e. below Baa3 by Moody's, BBB- by Standard & Poor's, or BBB- by Fitch. The Fund may also invest in unrated debt instruments deemed to be of similar credit quality by the Investment Manager. The average quality of the Fund's holdings will tend to be in the B2/B range, but is expected to fluctuate. In case of a security with two different ratings, the lower rating shall be decisive. In case of three or more different ratings, the lower rating of the two best ratings shall be decisive. If a security is unrated, then an equivalent credit rating, as deemed by the Investment Manager, may be used. In the event that a security is downgraded after its purchase, the Investment Manager may continue to hold such security on behalf of the Fund if it determines that it is in the best interest of the Fund. The Fund may hold equity securities, up to 5% of the market value of the Fund, if such securities are received as a result of a corporate restructuring or as a result of owning equity-linked securities (e.g. convertible bonds, warrants).

The Fund generally will be well-diversified by industry and issuer. Sector and quality weightings, as well as individual holdings, will vary. The Fund is expected to hold between 100-200 issuers and to have a low turnover.

## Global Exposure and Leverage

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

## Borrowing and Lending Powers

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

## Profile of a typical Investor

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

## Exposure to Securities Financing Transactions ("SFTs")

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

## German Taxation

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty

- Duration
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S	USD 1 million	USD 1,000
T	USD 5 million	
D, N, DL	USD 5,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.40%	N/A
T	N/A		N/A	N/A
D	5%		0.40%	0.40%
N	N/A		0.40%	N/A
DL	3%		0.40%	1.10%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington US\$ Core High Yield Bond Fund

**Legal entity identifier:**  
HUQCX11RKK5ZM76LRF67

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: __%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: __%</p>	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers with disclosed carbon data that enable the Fund to limit the overall impact of the portfolio on climate change relative to the investment universe by maintaining a lower weighted average carbon intensity - "WACI") than the ICE Bank of America US High Yield Constrained Index (the "Index").
2. Issuers are screened to enable the Fund to exclude investment in securities of any corporate issuer that generate more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).
3. Issuers are screened to enable the Fund to exclude investment in corporate issuers that generate more than 5% of their revenue from adult entertainment.

Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage difference of the Fund's WACI and that of the Index's.

The number of corporate issuers held that generate more than 25% of their revenue from thermal coal energy generation identified using a combination of third party and/or internal Wellington Management analysis.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.



The number of issuers held that generate more than 5% of their revenue from adult entertainment identified using a combination of third party and/or internal Wellington Management analysis.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will maintain a carbon footprint (weighted average carbon intensity) that is lower than the Index - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund’s exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the Fund's WACI compared to that of the Index and adjusts it so that it remains at least 25% lower than the Index.

The Fund excludes corporate issuers that generates more than 25% of their revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).

The Fund excludes corporate issuers that generates more than 5% of their revenue from adult entertainment.

Subject to any stricter criteria at set out above, the Fund also applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund maintains a WACI that is at least 25% lower than the Index.

The Fund excludes the securities of any corporate issuer that generates more than 25% of their revenue from thermal coal energy generation.

The Fund will not invest in any issuer that generates more than 5% of their revenue from adult entertainment.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

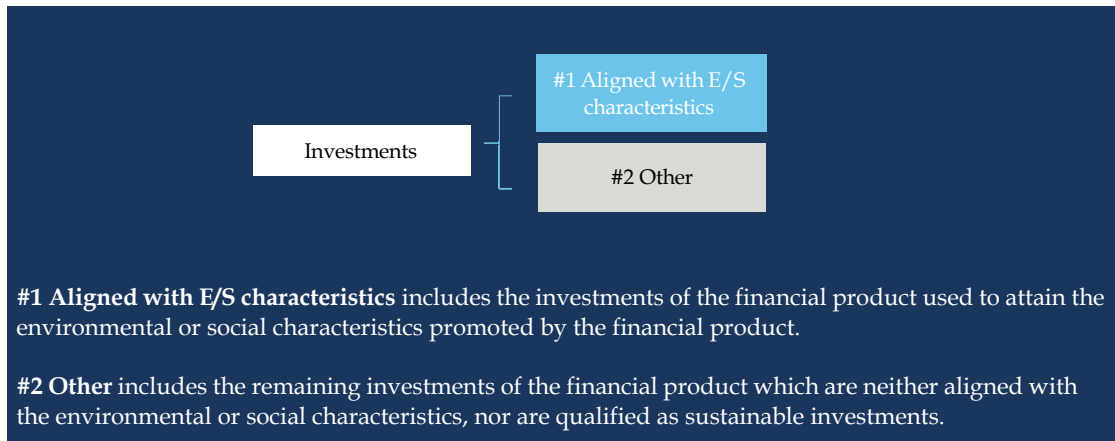
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

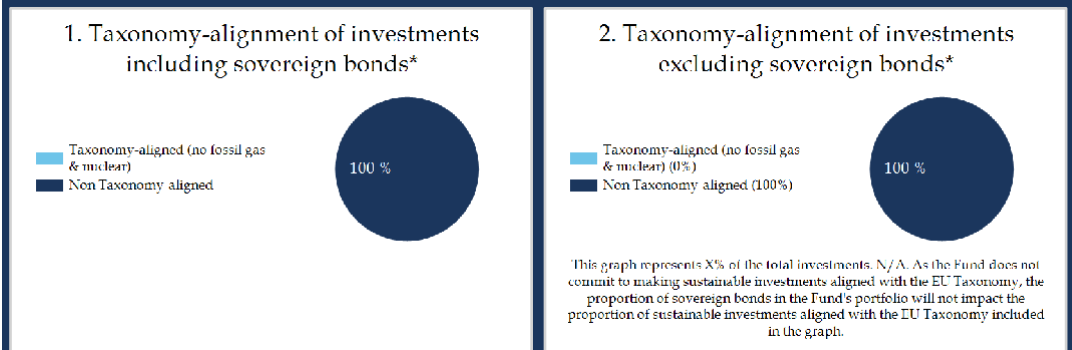
- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ' #2 Other ' may include cash and cash equivalents for liquidity purposes, derivatives for EPM and/or hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Whilst the Index is used for WACI comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000053\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000053)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington World Bond Fund**

This Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington World Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.



## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily through investment in global sovereign government and government-related debt combined with opportunistic exposure to other fixed income assets including corporate, securitized, developed and emerging market debt and currencies.

The Fund's investment approach combines a core allocation to a range of high-quality global sovereign debt with opportunistic exposure to a range of diversified investment strategies. This core sovereign debt exposure consists of bonds issued by countries that the Investment Manager believes have attractive valuations, offer good levels of liquidity and have stable to improving credit characteristics (characteristics which help identify the creditworthiness of a country, which may include its debt profile, economic performance or political risks). The opportunistic investment strategies may include allocations to:

- Macro, a strategy which uses research-driven fundamental and macroeconomic or 'top-down' analysis (which analyses the performance of the broader economic and/or political environment) to tactically manage interest rate and currency exposures at the country level;
- Country Rotation, a quantitative strategy which aims to identify where developed market government bond yields have been mis-valued;
- In addition, the Investment Manager will look for what it considers to be attractive investment opportunities in global corporate bonds, global high yield bonds, global asset-backed instruments (also referred to as securitized instruments) and emerging market bonds, primarily denominated in local currencies.

Allocations between the core or opportunistic sources of return are based on the Investment Manager's research and are made in consideration of the Fund's risk tolerance. During periods of market stress, the Investment Manager's allocation to opportunistic sources of return may be reallocated to the core market exposure in order to limit risk in the Fund. The Fund will include positions based on both long and short-term investment ideas. The time horizon for macro thematic ideas often have long-term investment horizons, while tactical ideas often have much shorter-term investment horizons.

Currency and interest rate exposures are actively managed within the Fund. Exposure to USD typically ranges from 50%-100% of the Fund and is combined with currency exposure across the major currency blocs (dollar bloc, Europe and Asia) with the aim of mitigating volatility, whilst gaining diversified currency exposure to countries which have relatively healthy monetary and fiscal fundamentals.

The Fund's risk-management framework involves daily risk monitoring both at the individual trade and overall fund level. It encompasses correlation analysis (looking at the strength of the relationship between different characteristics) as well as in-depth analysis of the Fund's sensitivity to current market forces.

The Fund is expected to have high average credit quality.

## Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### Social

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Fund does not consider a benchmark during portfolio construction or for performance comparison purposes.

The Fund may invest, either directly or indirectly through the use of FDIs, in a diversified portfolio of developed and what the Investment Manager considers to be emerging market debt securities comprising bonds issued by government, agency, quasi-sovereign, supranational, commercial and sub national government issuers as well as residential and commercial mortgage-backed securities, asset-backed securities, covered bonds, corporate and real estate investment trust ("REIT") debt (which are bonds and convertible bonds issued by a REIT), both fixed and floating-rate, preferred securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, as well as corporate bonds, and forward contracts on such securities. The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)) and bank loan assignments that qualify as Money Market Instruments.

The Fund may also buy and sell index linked bonds and credit linked notes whose interest payments and/or payment at maturity depend on the performance of an underlying index or security. The underlying

exposure of an index linked bond may be tied to a market index (such as a bond index or a credit default swap index) or an economic index (such as growth or inflation indices). The underlying exposure of a credit linked note is typically tied to a sovereign, quasi-sovereign or corporate bond issuer. In each case, the underlying exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option)). Such structured notes shall give exposure to underlying fixed income securities on an unleveraged basis.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds that invest in the types of securities listed above and which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and may be transferable securities or collective investment schemes. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising currency, interest rate, bond, index and inflation options, interest rate, bond, index and currency futures or options on futures, credit default swaps, index credit default swaps, interest rate, total return, inflation and currency swaps, swaptions and swaps on an index, warrants, bond and currency forwards and forward rate agreements to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will typically be positive, meaning that long positions will generally be in greater proportion than synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 0% and 300% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Securities held by the Fund may be denominated in US Dollars or other currencies. The Fund may hold cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents** in multiple currencies without restriction.

The Fund will generally be diversified by country, currency, issuer, and investment strategy, but may hold concentrated positions from time to time. The Fund is expected to experience a high level of turnover.

The Fund will be denominated in US Dollars. Currency exposure, from the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, is actively managed within the Fund and may include cross-currency positions which may or may not be influenced by the Fund's bond and cash equivalent positions.

The Fund will generally be diversified by country, currency, sector and issuer, but may hold positions that are concentrated from time to time. The Fund's investments will represent a broad credit spectrum, including issues rated below investment-grade. There is no minimum credit rating for individual securities or currencies. The Fund's Net Credit Exposure to securities rated below investment grade will not represent more than 50% of its Net Asset Value at the time of purchase. Net Credit Exposure to securitised securities will not represent more than 40% of the Fund's Net Asset Value at the time of purchase. Credit ratings for issues will be the highest of Moody's, S&P's, or Fitch's long-term ratings. If an issue is unrated, then an equivalent credit rating, as deemed by the Investment Manager, may be used. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**).

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as absolute VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed 20% of the Fund's Net Asset Value for a holding period equivalent to one month. The Fund adopts a one-tailed 99% confidence level under normal market conditions for a one month holding horizon and considering at least one year of historical data. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 0% and 900% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	20%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds,

Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Long-Short Strategy
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S	USD 1 million	USD 1,000
T	USD 5 million	
D, N, DL	USD 5,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.40%	N/A
T	N/A		N/A	N/A
D	5%		0.40%	0.50%
N	N/A		0.40%	N/A
DL	3%		0.40%	1.10%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington World Bond Fund

**Legal entity identifier:**  
549300OMU0PTQULTMQ53

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers that are screened to enable the Fund to limit its exposure to sovereign issuers whose fossil fuels exports represent a significant portion of their total exports.
2. Issuers with an E or S Rating to enable the Fund to exclude investment in the worst rated corporate issuers with the worse E or S Ratings relative to their peer universe, using a rating scale of 1-5, where 1 is the highest rating.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in sovereign issuers where fossil fuels make up more than 67% of their exports.

The number of corporate issuers held with an E Rating or S Rating of 5.

#### *What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund restricts its investment in sovereign issuers where fossil fuels make up more than two-thirds (67%) of exports to a maximum percentage of the Fund's NAV.

The Fund excludes investment in corporate issuers with an E or S Rating of 5, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund restricts investment in sovereign issuers where fossil fuels make up more than 67% of their exports to a maximum of 1.5% of the Fund's NAV.

The Fund excludes corporate issuers rated 5 for E or S Rating using a rating scale of 1-5, where 1 is the highest rating.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 65% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

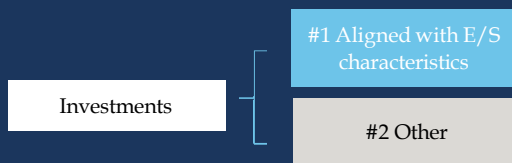
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities are** activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

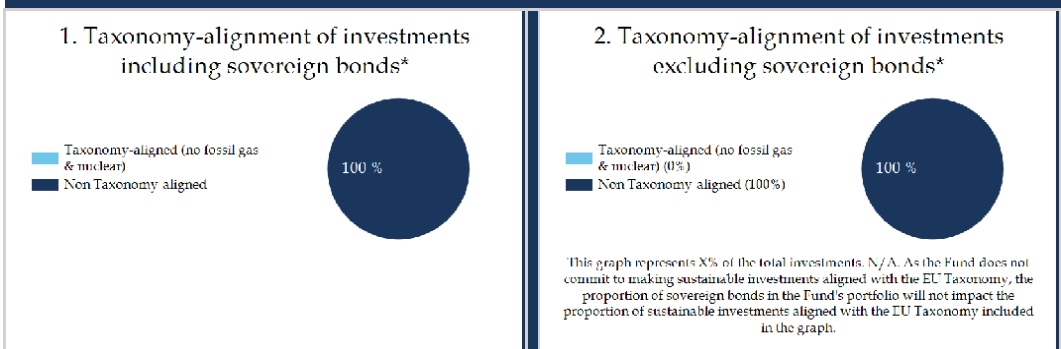
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes derivatives for EPM or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.

However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000054\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000054)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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**WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

**Wellington Blended Opportunistic Emerging Markets Debt Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Blended Opportunistic Emerging Markets Debt Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform a blended index of 50% JPMorgan Emerging Market Bond Index - Global Diversified and 50% JPMorgan Government Bond Index - Emerging Markets Global Diversified (the "Index"), primarily through investment in a diversified portfolio of US Dollar and local currency denominated emerging markets debt securities and currency instruments.

The Investment Manager uses an investment approach that seeks to take advantage of opportunities across the emerging markets debt securities spectrum, including hard currency (commonly referenced as bonds denominated in US dollars or other developed market currencies) and local currency denominated sovereign, quasi-sovereign, and corporate debt, currencies, and derivatives. The Investment Manager combines comprehensive top-down analysis with detailed bottom-up country and company research to identify the best investment opportunities. The Investment Manager's review of individual countries includes both quantitative and fundamental factors (those that are core to each country, for example political risk). Currency instruments will be used to both manage risk and seek to enhance return on an opportunistic basis. The Investment Manager employs the following investment philosophy in the ongoing management of the Fund:

- Emerging markets must be approached from a global perspective. Developed market events, trends, and policies can have a meaningful impact on emerging markets economies due to the trade and capital flow linkages. To understand emerging markets you must understand where each country fits in the broader global landscape.
- Disciplined research can uncover market mispricings. Risks and opportunities in emerging market countries are often misunderstood by market participants due to the size, diversity, and complexity of the market. The performance of countries and sectors can diverge for a range of reasons such as their stage of capital market development, stage in the economic cycle or policy-maker skill, among other things. Disciplined research that incorporates both quantitative and qualitative factors can be used to seek to capture unrecognized value in this market.
- Risk must be managed in a multi-dimensional way, using both quantitative and qualitative risk analysis.

The Investment Manager uses the following four key components when building the Fund:

1. **Broad Strategy:** an assessment of the global economic, liquidity and market conditions that are likely to have a material impact on emerging markets debt asset class valuations. More specifically, the Investment Manager looks at the health of the global economy, global central bank policies, broad economic and/or political trends that could drive the performance of emerging markets as a group, and the relative value of emerging market debt versus other investment opportunities. This assessment is used to set the overall risk stance of the portfolio.



2. Research: a combination of deep quantitative research (looking purely at financial and economic data) and fundamental research (incorporating a more holistic analysis of economic and political information) is carried out to find ideas across hard currency sovereign debt, corporate debt, local interest rates, and currencies. Quantitative modelling provides the Investment Manager with a consistent, baseline view of each country and currency. This quantitative approach helps facilitate comparisons across countries, issues, and currencies. The output of the Investment Manager's models is then evaluated by the Investment Manager's team of experienced sovereign analysts who conduct deep fundamental research to identify more qualitative factors not captured by the quantitative models that could have a meaningful impact on each country's economic and financial market performance. The analysts then make investment recommendations to the portfolio managers based on the full set of research.
3. Portfolio construction: The Investment Manager will select and scale positions from those recommendations based on the degree of conviction that it has in a particular idea, factoring in characteristics such as expected return, expected volatility and liquidity, as well as the Fund's overall risk and return objectives and investment guidelines.
4. Risk management: an in-depth evaluation of exposures is carried out by region, country, currency and sector and at the total Fund level. The team will also conduct sensitivity analysis to various market factors (looking at the sensitivity of one factor to changes in others) and scenario analysis across different market environments (looking at different possible outcomes) with the aim of ensuring that the portfolio is constructed in a manner that is consistent with the risk stance targeted at the outset of the process.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but may not have similar weightings. The Investment Manager uses broad tolerance ranges when considering how issuer weightings differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The JPMorgan Emerging Market Bond Index - Global Diversified tracks total returns for US Dollar-denominated debt instruments, both fixed and floating rate, issued by emerging market sovereign and quasi-sovereign entities. The JPMorgan Government Bond Index - Emerging Markets Global Diversified consists of domestic currency government bonds to which international investors can gain exposure. The Index uses a weighting scheme to reduce the weight of large countries and redistributing the excess to the smaller weight countries with a maximum weight of 10% per country.

The Fund will invest, either directly or indirectly through the use of financial derivative instruments ("FDIs"), in bonds issued by sovereign, quasi-sovereign agency, supranational, sub-national government and corporate, issuers; mortgage, commercial mortgage and asset-backed securities, <sup>hybrid securities comprising</sup> convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), global depository notes, warrants, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations) and, in addition, bank loan assignments that qualify as Money Market Instruments; and credit and index linked securities, which are debt securities of companies whose interest payments and/or payment at maturity depend primarily on the performance of one or more underlying credit exposures or market indices. A particular credit-linked security's underlying credit exposure may be to a sovereign, quasi-sovereign or corporate issuer. Underlying index exposures may be to an index tied to a country's economic exposure, debt or currency. In each case, the underlying credit or index exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option)), as well as other debt securities issued by public or private issuers, both fixed and floating-rate, including forward contracts on such securities and may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, comprising currency and bond options, interest rate, bond and currency futures, credit default swaps, index credit default swaps, interest rate, total return currency swaps, swaptions, warrants, bond and currency forwards, forward rate agreements and "to-be-announced" securities to gain exposure to the instruments listed above in pursuit of the investment objective and/or for efficient portfolio management purposes including hedging against risk. Derivatives may be used as a replacement for direct bond exposures, to hedge specific interest rate, currency or credit risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 75% and 200% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing

market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices the constituents of which include the types of securities described above, in which the Fund may directly invest.

The Fund may invest in any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. Developed market exposures are also permitted. The Fund may invest in securities traded in China via Bond Connect (see also section in the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**) and may make substantial investment in securities traded on Russian markets.

As a result of the invasion of Ukraine, the Investment Manager will not make any new purchases of Russian securities for the Fund without giving notice to the shareholders in the Fund at that time. In future, subject to international sanctions being lifted, and such notice being given, the Investment Manager may in its discretion consider making new investments in Russia securities for the Fund.

Currency exposure to multiple currencies will be taken on an opportunistic basis. Currency exposure to both emerging markets and developed countries, including cross-currency positions, which are not related to the Fund's bond and cash equivalent positions, will be assumed. Currency instruments will be used to both manage risk and seek to enhance return on an opportunistic basis.

The Fund's maximum exposure to corporate debt is expected to be 50% of the NAV of the Fund, and to local debt 100% of the NAV of the Fund.

The Fund generally will be diversified by country, currency and issuer but may hold concentrated positions from time to time. The Fund is expected to have moderate to high turnover.

There is no limit on the duration of individual Fund holdings; however, duration at the Fund level is expected to be limited to the duration of the Index +/- 2 years. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Fund's Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 4 years and will not be higher than 8 years.

Investments will be drawn from the broad credit spectrum. The Fund's weighted average credit quality, including cash and cash equivalents may be below investment grade but is generally expected to be in the range of debt securities which are considered by the Investment Manager to be rated BBB through BB inclusive. There will be no limitations on the credit quality of individual securities or currencies in the Fund.

The Fund will invest in both US Dollar-denominated securities and in securities denominated in currencies other than the US Dollar.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 0% and 700% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. If the expected level of leverage was calculated taking into account netting of equal and opposite foreign exchange forward contracts and excluding the share class hedging, the level of leverage would be expected to be lower and generally between 0% and 150% of the Fund's Net Asset Value. Further information on leverage can be found in the section of the Prospectus entitled **Leverage**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total return. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	20%
SFTs	1%	60%

Further information on SFTs can be found in the section of the Prospectus entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the third Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within three Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review

this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S	USD 1 million	USD 1,000
T	USD 5 million	
D,N,DL	USD 5,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Name	Class	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee	Performance Fee
S		N/A		0.55%	N/A	N/A
T		N/A		N/A	N/A	N/A
D		5%		0.55%	0.55%	N/A
N		N/A		0.55%	N/A	N/A
DL		3%		0.55%	1.10 %	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Blended Opportunistic  
Emerging Markets Debt Fund

**Legal entity identifier:**  
549300LR2UYRYB8L5W50

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet the following environmental or social characteristic.

The Fund will invest in issuers with ESG ratings and maintain an overall weighted average ESG Rating, in excess of the blended index of 50% JPMorgan Emerging Market Bond Index - Global Diversified and 50% JPMorgan Government Bond Index - Emerging Markets Global Diversified (the "Index").

Whilst the Index is used for ESG Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The difference between the Fund's weighted average ESG Rating and that of the Index.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund maintains an overall weighted average ESG Rating in excess of the Index, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average ESG Rating in excess of the Index.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

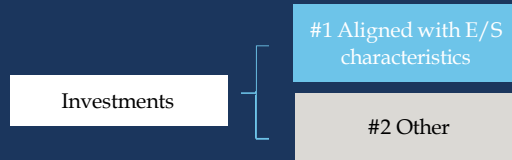
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Certain derivatives with an ESG Rating are used for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund and are considered as part of the calculation of the overall weighted average ESG Rating, which the Fund has committed to ensuring is in excess of the Index.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for ESG Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F001167\)%26languageCd=EN&recentMatch=true&download=true/u](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001167)%26languageCd=EN&recentMatch=true&download=true/u)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Emerging Local Debt Advanced Beta Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Emerging Local Debt Advanced Beta Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## **INVESTMENT OBJECTIVE AND POLICY OF THE FUND**

### **Investment Objective**

The investment objective of the Fund is to seek long-term total returns.

### **Investment Policies**

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily through investment in a diversified portfolio of emerging markets local currency-denominated sovereign debt securities and currency instruments.

The Investment Manager seeks to build a portfolio that targets a return that is broadly equivalent to overall market returns but with less risk. Overall market returns are considered to be the return of a market capitalisation weighted index. The exposure of such an index to a market is broadly referred to as "Beta". Such an index can provide a certain level of diversification and return, however, traditional index methodology uses the market capitalisation of a country's outstanding debt to determine that country's weighting, which results in more-indebted countries often dominating the index. The Investment Manager considers that the Fund can be constructed to provide exposure to a market in an alternate manner to that of the indices (beta) described above but with lower risk. The Investment Manager calls this "Advanced Beta". In this regard, by utilizing the "Advanced Beta" approach the Investment Manager seeks to reduce the risk of emphasizing larger issues of debt due to strict focus on market capitalisation, by applying an additional screening process in the selection of debt securities for the Fund to provide a similar level of exposure but with lower risk.

The Investment Manager aims to deliver risk adjusted returns for emerging local debt investors using a quantitative approach to the key drivers of emerging local market risk and return. These may be implemented through, for example:

- Investing in intermediate maturity bonds (which are bonds with maturity dates of typically between 3-7 years) which tend to have more stable return profiles.
- Owning bonds in countries with steeper yield curves (meaning the difference between short and long term interest rates is wider indicating stronger future economic activity), which can provide enhanced opportunities to capture returns from both income and capital gain.
- Balancing the Investment Manager's view on the risk versus potential returns gained through investing in different markets based on historical data.
- Proactively hedging currency exposure to reduce its contribution to portfolio volatility.

Steep yield curves and higher short-term rates both provide incremental yield (income), while hedging lower carry currencies and diversifying the funding currency are intended to lower currency volatility. The Investment Manager will invest in a manner focused on reducing volatility and using the above outputs with a forward-looking perspective on the creditworthiness of each country, as well as the liquidity and trading costs in each market.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:



### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### **Social**

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under Sustainability Risks within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

When the Fund invests in emerging market local currency denominated debt securities it creates an implicit short exposure in the Base Currency of the Fund. Changes in exchange rates between the Base Currency and the local market currencies could create volatility in the Fund's returns. The Investment Manager will, using currency derivatives, seek to reduce this volatility by diversifying the Fund's Base Currency short exposure across a basket of short exposures to developed market currencies. In order to ensure the USD and non-USD Share Classes have substantially the same exposure to the basket of developed market currency short exposures and therefore similar investment returns, the Dealing Currency of the non-USD Share Classes will include a hedge against the USD Base Currency as described in more detail in the Prospectus in the section entitled **Other Share Class Transactions**.

The JP Morgan Government Bond Index – Emerging Markets Global Diversified Index (the "Index") serves as a reference benchmark for performance and regulated average ESG score comparison and as a proxy for the overall market returns for volatility measurement. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index consists of domestic currency government bonds to which international investors can gain exposure. The Index uses a weighting scheme to reduce the weight of large countries and redistributing the excess to the smaller weight countries with a maximum weight of 10% per country.

The Fund will invest, either directly or indirectly through financial derivative instruments ("FDIs") (set out in the Prospectus). FDIs will primarily provide both long and short exposure to emerging markets fixed income securities and currencies and developed market currencies. The Fund may invest in bonds issued by sovereign, quasi-sovereign agency, supranational and sub national government issuers, loan participation securities that qualify as an eligible investment by the Fund and may be securitised or unsecuritised, warrants and credit and index linked securities, which are debt securities of companies whose interest payments and/or payment at maturity depend primarily on the performance of one or more

underlying credit exposures or market indices. A particular credit-linked security's underlying credit exposure may be to a sovereign or quasi-sovereign issuer. Underlying index exposures may be to an index tied to a country's economic exposure, debt or currency. In each case, the underlying credit or index exposure will be consistent with the Fund's investment objective and policies. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)) and other debt securities issued by public or private issuers, both fixed- and floating-rate, including forward contracts on such securities.

The Fund may invest in collective investment schemes as described in the Prospectus in the section entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs.

The Fund may buy and sell exchange-traded and over-the-counter derivative instruments, comprising currency, interest rate, bond and index options, interest rate, bond, index and currency futures, or options on futures, credit default swaps, index credit default swaps, interest rate, total return and currency swaps, swaptions and swaps on an index, deliverable and non-deliverable currency forwards, forwards on bonds or other debt securities and forward rate agreements, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. The Fund may engage in repurchase transactions for efficient portfolio management purposes only. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the Prospectus in the section entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 90% and 120% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

The Fund will be denominated in US Dollars. Currency exposure, from the use of forward currency exchange contracts in multiple currencies, will be taken on an opportunistic basis as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**. Currency exposure to both emerging markets and developed countries, including cross-currency positions, which are not related to the Fund's bond and cash equivalent positions, will be assumed. Debt securities may be denominated in US Dollars or other currencies. The Fund may hold cash and cash equivalents as described in the Prospectus in the section entitled **Cash and Cash Equivalents** in multiple currencies without restriction.

There is no limit on the duration of individual Fund holdings; however, duration at the Fund level is expected not to exceed 8 years, in normal market circumstances. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices

will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%.

The Fund may invest in any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. Developed market exposures are also permitted. The Fund may invest in securities traded in China via Bond Connect (see section entitled **Risks linked with dealing in securities in China via Bond Connect** in the Prospectus) and may make substantial investment in securities traded on Russian markets from time to time.

As a result of the invasion of Ukraine, the Investment Manager will not make any new purchases of Russian securities for the Fund without giving notice to the shareholders in the Fund at that time. In future, subject to international sanctions being lifted, and such notice being given, the Investment Manager may in its discretion consider making new investments in Russia securities for the Fund.

The Fund generally will be diversified by country, currency, sector and issuer, but may hold positions that are concentrated from time to time. The Fund's weighted average credit quality is expected to be investment grade, but investments may be drawn from a broad credit spectrum. However, the Fund may only purchase securities if rated at least speculative grade i.e. B3 by Moody's, B- by S&P, or B- by Fitch, or an equivalent internal rating by the Investment Manager with the exception of credit linked notes and asset backed securities which shall always be investment grade. In case of two different ratings, the lower rating shall be decisive. In case of three or more different ratings, the lower rating of the two best ratings shall be decisive. Any securities which fall below the minimum required rating subsequent to purchase may continue to be held, provided that any such downgraded securities do not in aggregate exceed 3% of the Net Asset Value of the Fund. Otherwise, they will be sold within six months from the downgrading, unless the rating is upgraded within that period. The Investment Manager will under no circumstances rely exclusively or automatically on external ratings in determining the credit risk of a financial instrument, and the Investment Manager will perform its own credit assessment with respect to each investment.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as absolute VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed 20% of the Fund's Net Asset Value for a holding period equivalent to one month. The Fund adopts a one-tailed 99% confidence level under normal market conditions for a one month holding horizon and considering at least one year of historical data. Further information on the risk management method can be found in the Prospectus in the section entitled Financial Derivative Instruments (FDIs).

It is expected that the Fund will generally incur leverage up to a maximum rate of 700% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of non-USD Share Classes. If the expected level of leverage were calculated taking into account netting of equal and opposite foreign exchange forward contracts, and excluding the share class hedging, the level of leverage would be expected

to be lower and generally between 0% and 200% of the Fund's Net Asset Value. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is intended for professional investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com.

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent, is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the third Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within three Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk

- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
SB, SC, TB, TC	USD 5 million	USD 1,000	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. The SB and TB Share Classes are only available as unhedged USD Share Classes and the SC and TC Share Classes are only available in the above non-USD Dealing Currencies.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

Currency hedging transactions will also be executed at a share class level for the SC and TC Share Classes. These transactions will hedge the Dealing Currency against the Base Currency as described above. However the objective of these transactions, in combination with the currency derivatives put in place by the Investment Manager within the portfolio itself, is to ensure that the Shareholders in the SC or TC Share Classes, being the non-USD Share classes, have substantially the same currency exposures as the Shareholders in the SB or TB Share Classes respectively, being the USD Share classes, and therefore receive similar investment returns. The investment returns will differ to the extent of the costs of these currency hedging transactions at share class level and also the difference in interest rates between the Dealing Currency and the Base Currency which may have a positive or negative impact on returns.

These share class currency hedging transactions will comply with the requirements of the Central Bank (including the limits regarding over-hedging described in the **Hedged Share Class Transactions** section in the Prospectus). The class level transactions will be clearly attributable to the relevant SC or TC Share Class and gains, losses and costs of the relevant transactions will accrue solely to the relevant Share Class. SC or TC Share Classes will only be created where the Investment Manager believes that they will not prejudice the interests of the holders of other share classes. Furthermore, the derivative transactions to which the Share Class relates will not result in a leveraged return per Share Class.

Shareholders in the SC or TC Share Classes should be aware that the above share class hedging transactions in combination with the currency hedging transactions referred to under **Investment Policies** above may result in those Share Classes not benefiting fully from changes in relative currency values.

There can be no assurance that the above strategy will be successful.

**Class SB and SC Shares** are reserved for Institutional Investors.

**Class TB and TC Shares** are reserved for Institutional Investors that have a direct investment advisory or other relationship with the Investment Manager or its affiliates, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

The value of the Share Classes in the Fund will be subject to exchange rate risk in relation to a basket of developed market currencies.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee is accrued daily in the Net Asset Value of the relevant Classes of Shares and paid monthly in arrears at the annual rate set out in the table below.

<b>Share Class Name</b>	<b>Investment Management Fee</b>
SB	0.30%
SC	0.30%
TB	Not applicable
TC	Not applicable

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for Classes SC, SB, TC and TB.

Fees for services related to managing currency at the share class level are borne by the Investor Manager directly.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Emerging Local Debt  
Advanced Beta Fund

**Legal entity identifier:**  
5493000R38EMCUIFSH52

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> <input checked="" type="checkbox"/> No
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: __%</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: __%</p>	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with a social objective</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet the following environmental or social characteristic.

The Fund will invest in issuers with an ESG rating and maintain an overall weighted average ESG Rating, in excess of the JP Morgan Government Bond Index – Emerging Markets Global Diversified Index (the "Index").

Whilst the Index is used for ESG Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The difference between the Fund's weighted average ESG Rating and that of the Index.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these

restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr) .



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the weighted average ESG Rating of the issuers and ensures that it remains better than that of the Index, using the MSCI sovereign ESG Rating, adjusted for Real Per Capita GDP. Ratings are based on an ESG Ratings framework specific to the Fund which uses external data.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average ESG Rating in excess of the Index.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

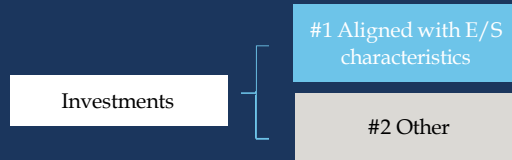
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Certain derivatives with an ESG Rating are used for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund and are considered as part of the calculation of the overall weighted average MSCI Sovereign ESG Rating adjusted for Real Per Capita GDP, which the Fund has committed to ensuring is in excess of the Index.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for ESG Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000031\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000031)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Emerging Local Debt Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Emerging Local Debt Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the JP Morgan Government Bond Index – Emerging Markets Global Diversified Index (the “Index”), seeking to achieve the objective primarily through investment in a diversified portfolio of emerging markets local currency-denominated debt securities and currency instruments.

The Investment Manager uses an investment approach that seeks to take advantage of opportunities in local currency denominated debt and currency markets. The Investment Manager combines comprehensive top-down analysis with detailed bottom-up country research to identify the best investment opportunities. Interest rates and currencies are evaluated on two separate but parallel tracks, as the performance of those two components of the local debt market can be driven by different factors. The Investment Manager’s review of individual markets includes both quantitative research (looking purely at financial and economic data) and fundamental research (incorporating a more holistic analysis of economic and political information).

The Investment Manager employs the following investment philosophy in the ongoing management of the Fund:

1. Emerging markets must be approached from a global perspective. Developed market events, trends, and policies can have a meaningful impact on emerging markets economies due to the trade and capital flow linkages. To understand emerging markets you must understand where each country fits in the broader global landscape.
2. Disciplined research can uncover market mispricings: Risks and opportunities in emerging market countries are often misunderstood by market participants due to the size, diversity, and complexity of the market. The performance of countries and sectors can diverge for a range of reasons such as their stage of capital market development, stage in the economic cycle or policy-maker skill, among other things. Disciplined research that incorporates both quantitative and qualitative factors can be used to capture unrecognized value in this market.
3. Risk must be managed in a multi-dimensional way, using both quantitative and qualitative risk analysis.

The Fund’s investment process includes the following:

1. Broad Strategy: An assessment of the key global economic, liquidity, and market conditions likely to have an impact on emerging local debt valuations. More specifically, the Investment Manager looks at the health of the global economy, global central bank policies, broad economic and/or political trends that could drive the performance of emerging markets as a group, and the relative value of emerging market debt versus other investment opportunities. The Investment Manager combines this quantitative and macroeconomic analysis with an assessment of credit fundamental trends across countries to evaluate these key global factors likely to have an impact on emerging



markets local debt and currency valuations. This assessment is used to set the overall risk stance of the portfolio.

2. Research: An in-depth country research on two separate but parallel tracks – interest rates and currencies. The Investment Manager believes that these are the two primary drivers of emerging local debt performance.
  - Interest rates: The Investment Manager’s interest rate models incorporate inputs such as growth, inflation and inflation expectations to try to identify the likely path of interest rates in each country over time. Fundamental economic and political research is then paired with model output to develop a holistic view of the potential opportunity in each local interest rate market.
  - Currencies: The Investment Manager has developed a process for evaluating the price, demand, and supply of currencies to help identify which currencies are most likely to appreciate, remain stable, or depreciate. Again, fundamental economic, political, and technical research is paired with the model output to develop a holistic view of the potential opportunity in each local currency market.
3. Portfolio Construction: The Investment Manager favours the interest rate and currency markets that offer the best predicted return profile for a given level of risk. The Investment Manager will select and scale positions based on the degree of conviction that the Investment Manager has in a particular idea, based on the Investment Manager's consideration of each security's characteristics including potential return, expected volatility and liquidity, as well as the Fund's overall risk and return objectives and investment guidelines.
4. Risk Management: An in-depth risk management involving the evaluation of exposures is carried out by region, country, and currency as well as at the total Fund level. The Investment Manager will also conduct sensitivity analysis to various market factors (looking at the sensitivity of one factor to changes in others) and scenario analysis across different market environments (looking at different possible outcomes) with the aim of ensuring that the portfolio is constructed in a manner that is consistent with the risk stance targeted at the outset of the process.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

## Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index consists of domestic currency government bonds to which international investors can gain exposure. The Index uses a weighting scheme to reduce the weight of large countries and redistribute the excess to the smaller weight countries with a maximum weight of 10% per country.

The Fund will invest, either directly or indirectly through the types of financial derivative instruments ("FDIs") more fully described in the section of the Prospectus entitled **Types and Description of FDIs** for investment purposes and for efficient portfolio management including hedging against risk. FDIs will primarily provide both long and short exposure to emerging markets fixed income securities, currencies and interest rates. The Fund may also invest, in the same manner, in bonds issued by sovereign, quasi-sovereign agency, supranational and sub national government issuers, mortgage-, commercial mortgage-, and asset-backed securities, corporate debt, global depositary notes, hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), warrants, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations), and, in addition, bank loan assignments that qualify as Money Market Instruments; and credit and index linked securities, which are debt securities of companies whose interest payments and/or payment at maturity depend primarily on the performance of one or more underlying credit exposures or market indices. A particular credit-linked security's underlying credit exposure may be to a sovereign, quasi-sovereign or corporate issuer. Underlying index exposures may be to an index tied to a country's economic exposure, debt or currency. In each case, the underlying credit or index exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option)), as well as other debt securities issued by public or private issuers, both fixed- and floating-rate, including forward contracts on such securities and equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The Fund may buy and sell exchange-traded and over-the-counter derivative instruments, comprising currency, interest rate, bond and index options, interest rate, bond, index and currency futures, or options on futures, credit default swaps, index credit default swaps, interest rate, total return and currency swaps, swaptions and swaps on an index, deliverable and non-deliverable currency forwards, forwards on bonds

or other debt securities and forward rate agreements, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. The Fund may engage in repurchase transactions for efficient portfolio management purposes only. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the Prospectus in the section entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 50% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

The Fund may invest in any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. Developed market exposures are also permitted. The Fund may invest in securities traded in China via Bond Connect (see also section in the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**) and may make substantial investment in securities traded on Russian markets.

As a result of the invasion of Ukraine, the Investment Manager will not make any new purchases of Russian securities for the Fund without giving notice to the shareholders in the Fund at that time. In future, subject to international sanctions being lifted, and such notice being given, the Investment Manager may in its discretion consider making new investments in Russia securities for the Fund.

Currency exposure to multiple currencies will be taken on an opportunistic basis. Currency exposure to both emerging markets and developed countries, including cross-currency positions, which are not related to the Fund's bond and cash equivalent positions, will be assumed, with net exposure to emerging market currencies not expected to exceed 125% of the Net Asset Value of the Fund. Currency instruments will be used to both manage risk and seek to enhance return on opportunistic basis.

The Fund's maximum exposure to corporate debt is expected to be 25% of the Net Asset Value of the Fund.

There is no limit on the duration of individual Fund holdings; however, duration at the Fund level is expected to be limited to the duration of the Index +/- 2.5 years. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Fund's Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 3.5 years, and will not be higher than 8.5 years.

The Fund generally will be diversified by country, currency and issuer but may hold positions that are concentrated from time to time. The Fund is expected to have high turnover.

Investments will be drawn from the broad credit spectrum. The Fund's weighted average credit quality, including cash and cash equivalents may be below investment grade. There will be no limitations on the credit quality of individual securities or currencies in the Fund.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage up to a maximum rate of 1000% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum of gross notional values of FDIs may not reflect the true economic risk of the Fund. The maximum figure above includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. If the expected level of leverage were calculated taking into account netting of equal and opposite foreign exchange forward contracts, and excluding the share class hedging, the level of leverage would be expected to be lower and generally between 0% and 300% of the Fund's Net Asset Value. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total return. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	5%	20%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent, is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the third Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within three Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S	USD 1 million	USD 1,000	
T, NI, NR,G	USD 5 million		
D, N,DL, GN, GR	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class NI and NR** Shares are reserved for certain investors, acting as financial intermediaries on behalf of underlying beneficial holders, investing in the Fund.

**Class G** Shares (including the Class GN and Class GR Shares) are reserved for existing Shareholders whose previous Shares have been changed, and serves as a “grandfathered” Class enabling the Shareholders to remain invested without undergoing those changes. The G, GN and GR Classes are only available to those investors that were holding S, N and R Shares in the Fund as at 19 May 2015. A distribution fee is payable in respect of the Class GR Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.50%	N/A
T	N/A		N/A	N/A
D	5%		0.50%	0.50%
N	N/A		0.50%	N/A
DL	3%		0.50%	1.10%
NI	N/A		0.65%	N/A
NR	N/A		1.20%	N/A
G	N/A		0.45%	N/A
GN	N/A		0.45%	N/A
GR	N/A		0.45%	0.75%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, DL and GN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.



## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Emerging Local Debt Fund

**Legal entity identifier:**  
T2BK04MUWOPCCRKUA128

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: __%</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: __%</p>	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</p> <p style="margin-left: 20px;"><input type="checkbox"/> with a social objective</p> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Issuers with an S Rating to enable the Fund to maintain an overall weighted average S Rating, in excess of the JP Morgan Government Bond Index – Emerging Markets Global Diversified Index (the "Index").
2. Corporate or quasi- sovereign issuers that are screened for United Nations Global Compact Principles to enable the Fund to avoid investment in businesses that do not have responsible practices in the areas of human rights, labor, the environment, and corruption by excluding investment in any corporate or quasi- sovereign issuers that are identified as failing to comply with the United Nations Global Compact principles.

Whilst the Index is used for S Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The difference between the Fund's weighted average S Rating and that of the Index.

The number of corporate or quasi-sovereign issuers held identified as failing to comply with the United Nations Global Compact.

#### *What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.
3. The Fund excludes companies which have been identified as failing to comply with the United Nations Global Compact – PAI: Violations of United Nations Global Compact.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr)



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund will maintain an overall weighted average S Rating in excess of the Index, using a rating scale of 1-5, where 1 is the highest rating.

The Investment Manager excludes investment in any corporate or quasi-sovereign issuers that are identified as failing to comply with the United Nations Global Compact principles.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average S Rating in excess of the Index.

The Fund excludes corporate or quasi-sovereign issuers identified as failing to comply with the United Nations Global Compact.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 85% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

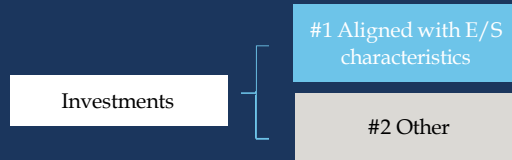
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Certain derivatives with an S Rating are used for the purpose of attaining the social characteristics promoted by the Fund and are considered as part of the calculation of the overall weighted average S Rating, which the Fund has committed to ensuring is in excess of the Index.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

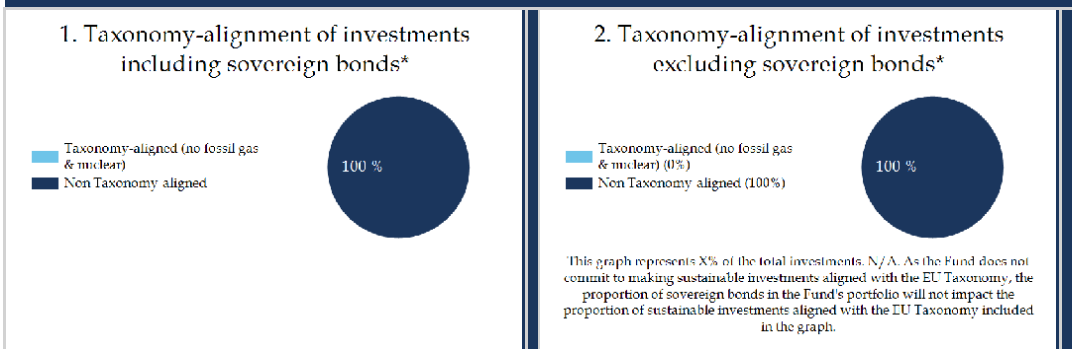
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.

However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for S Ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000027\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000027)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Emerging Markets Equity Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Emerging Markets Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.



## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI Emerging Markets Index (the "Index") and achieve the objective, primarily through investment in equity securities of companies that are either located in emerging markets or conduct substantial business in emerging markets. The Investment Manager uses bottom-up fundamental research on companies, industries, and countries to seek to identify emerging markets stocks with the strongest returns, adjusted for risk and liquidity.

The Investment Manager will invest in companies domiciled or listed in emerging markets, and to a lesser extent, in developed and frontier market countries. Investments in developed markets will be focused on companies which conduct substantial business in emerging markets as determined by the Investment Manager, including (i) companies that have substantial assets in emerging markets; (ii) companies the Investment Manager believes will experience significant growth from business activities conducted in emerging markets; and (iii) companies that derive a substantial portion of their total revenues from either goods and services produced in, or sales made in, emerging markets.

The Fund will generally be well diversified across markets, sectors and companies, investing opportunistically across market capitalization and style.

Core to the Investment Manager's investment philosophy is the belief that emerging market stock prospects depend upon country, sector, and business level factors, any or all of which can be mispriced. Additionally, significant changes in these factors can lead to inflections in business growth or returns on capital that are often initially undervalued.

The Investment Manager makes its investment decisions by conducting in-depth research on countries, sectors, and stocks.

- **Country Research:** The Investment Manager's in-house research expertise will identify countries with robust institutions and financial infrastructure. In most instances, country analysis serves as an input into the Investment Manager's bottom-up stock selection process. However, on rare occasions, decisions are made to reduce or increase the Fund's exposure to a country in expectation of a substantial change in the country's assessed risk profile.
- **Sector Research:** The Investment Manager evaluates sectors from a global and country perspective. Within countries, the Investment Manager seeks to identify industries that will benefit from factors such as economic growth and valuations
- **Company Research:** Stock selection is based on the extensive fundamental research capabilities of the Investment Manager. Research focuses on identifying companies with attractive valuations, strong management teams and ethical behaviour.



## Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### Social

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under Sustainability Risks within the section of the Prospectus entitled **Risk Factors**.

Position sizing reflects the Investment Manager's target prices, level of conviction, and risk assessments. Risk analysis is an integral part of the investment process and is monitored and managed at the security, sector, country, and total Fund levels on an on-going basis.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how country, sector and security weightings differ from the Index, with sector and country weights generally falling within range of the Index +/-10%, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index is designed to measure large- and mid-cap equity market performance across global emerging markets. Total return, rather than income generation, will be emphasised. The Index does not take into account the environmental and social characteristics referenced above.

For temporary defensive purposes in case of unusual or extraordinary market conditions, the Fund may hold up to 100% of its assets in ancillary liquid assets. The Fund may make substantial investment in securities traded on Russian markets and may invest in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

The Fund will invest, either directly or indirectly through the use of FDIs, in equity securities and other securities with equity characteristics, such as preferred stocks, warrants on equities, convertible securities, as well as depository receipts for such securities (such as ADRs, GDRs and European Depository Receipts)

issued by entities having their seat or exercising a predominant part of their economic activities in an emerging market as determined above. The Fund may buy and sell exchange-traded and over-the-counter FDIs both long and short to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against currency risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** GBP;

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day, except where Hong Kong banks or exchanges are expected not to be open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before

making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Indian Rupee Repatriation Risk
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than USD is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against USD, which is the working currency of the Fund from a portfolio management perspective.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N Shares** are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.70%	N/A
T	N/A		N/A	N/A
D	5%		0.70%	0.75%
N	N/A		0.70%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
**Wellington Emerging Markets Equity Fund**

**Legal entity identifier:**  
**0XZZ2OQJ CXR11I4TL7M98**

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following social characteristics.

1. Issuers who receive a survey to enable the Fund to promote the adoption of appropriate policies and practices among certain investee companies with regard to modern slavery risk management, forced labour, child labour and debt bondage (“Modern Slavery”). In order to do this, the Investment Manager applies Wellington Management Group’s Emerging Markets Modern Slavery Policy (the “EM Modern Slavery Policy”). Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research and third-party research for inclusion to the Watch List (as defined below) and various levels of engagement are undertaken over a period of time until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which have exposure to such risk and which are not subject to enhanced engagement. Further details about the EM Modern Slavery Policy and Watch List may be found in the section below “What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?”.

2. Issuers that are screened for United Nations Global Compact Principles to enable the Fund to further promote appropriate policies and practices with regard to child labour and forced labour by excluding investment in companies that are assessed for and known to be involved in controversies regarding child labour or forced labour. In order to do this, the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) and 5 (businesses should uphold the effective abolition of child

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

labour).



A reference benchmark has not been designated for the purpose of attaining the social characteristics promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The percentage of the Fund's equity issuers who received a survey and have been formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management. Since at least 70% of the Fund's equity issuers are generally expected to receive a survey and be formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management, this percentage is expected to be at least 70%.

The percentage of companies held for over a year that have responded to an engagement survey regarding their modern slavery risk management policies and procedures. Since this percentage will depend on 1) the time of the investments and 2) the response to the engagement of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies deemed as having a higher risk of Modern Slavery exposure that are placed on the Watch List and are subject to enhanced engagement. Since this percentage will depend on 1) the time of the investments and 2) the result of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies where remediation measures have been adopted such that they are no longer assessed as having a higher risk of Modern Slavery exposure and may be removed from the internal Watch List. Since this percentage will depend on 1) the time of the investments and 2) the result of the remediation measures adopted following the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The number of companies held which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour). Since the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 and 5, this number is expected to be 0.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



### Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund’s existing investment Guideline, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the social characteristics promoted by the Fund is described below.

The Investment Manager applies Wellington Management Group's Emerging Markets Modern Slavery Policy. Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research, third-party research and engagement. At a minimum, all companies held in the Fund for a period of one year or longer will be subject to engagement regarding Modern Slavery risk management via an initial survey outreach. Due to the Fund's expected turnover, some companies may be held in the Fund for less than a year and as a result may not be engaged with regard to Modern Slavery risk management.

Additionally, the Investment Manager excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

Investee companies engaged with will be reviewed based on the Investment Manager's research into the policies and operations of such companies and in accordance with the EM Modern Slavery Policy. This review will assess the Modern Slavery risk profile of each actively held company and the measures each actively held company has put in place to manage exposure to the risk of Modern Slavery on a peer relative basis. This assessment may be made on a number of factors including, but not limited to, industry and country Modern Slavery risk assessment, the adequacy of policies and procedures in place to mitigate Modern Slavery exposure risk, the profile of and visibility into the investee supply chain, and the extent to which the investee company is transparent with regard to its policies and operations and the market capitalization of the company. Upon the Investment Manager's review, investee companies which are deemed by the Investment Manager as having a higher risk of Modern Slavery exposure, and which in the Investment Manager's opinion do not have adequate policies and procedures in place to manage Modern Slavery risk will be placed on an internal watch list (the "Watch List") and subject to enhanced engagement. Companies identified for enhanced engagement will be subject to higher scrutiny while actively held in the Fund for a cumulative period of up to 5 years from the point of initial inclusion on the Watch List. Where the Investment Manager divests from a company, that company may no longer be subject to enhanced engagement. If the Investment Manager reinvests in such company, the 5-year cumulative period will commence again based on where it was before the company was sold. The Investment Manager expects to engage with 100% of investee companies included on the active Watch List over a period of up to 5 years.

During that five-year cumulative enhanced engagement period, the Investment Manager will encourage Watch List companies to implement appropriate policies and practices with regard to Modern Slavery risk management. Tools for enhanced engagement may include, but are not limited to, one-on-one meetings with management and/or members of the board, shareholder proposals and exercising voting rights. The use of these tools will be governed in concert with Wellington Management's Engagement Policy.

During the five-year cumulative enhanced engagement period, the Investment Manager is able to increase the Fund's holding in a Watch List company or purchase a Watch List company. Watch List companies which fail to demonstrate adequate progress on Modern Slavery risk management after a period of five years of enhanced engagement will be excluded from the Fund's investible universe (and if held disinvested by the Fund) until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which may have exposure to such risk and which are not subject to enhanced engagement.

The Fund also excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

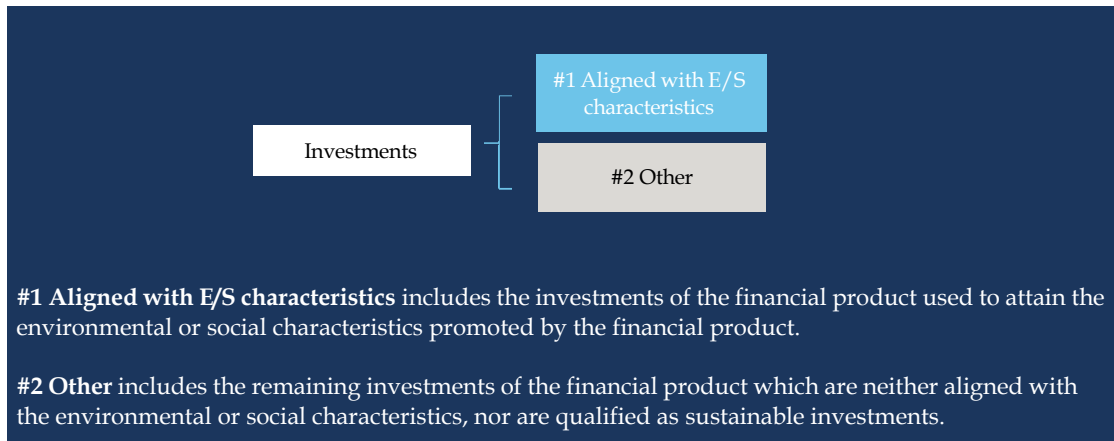
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

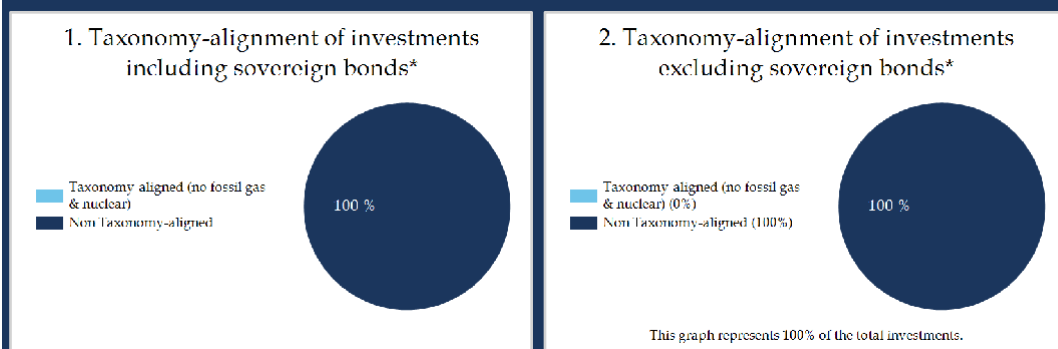
- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under 'Other' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



**Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000029\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000029)%26languageCd=EN&recentMatch=true&download=true)



The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Focused European Equity Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Focused European Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI Europe Index (the "Index") and achieve the objective primarily through investment in the equity and equity related securities of companies domiciled or operating primarily in developed European markets.

The Fund will invest in securities where the Investment Manager believes that markets have overreacted to unexpected or prolonged negative news, which has caused share prices to excessively discount near-term information, or where the stock is priced as though the business will never improve. It is the Investment Manager's view that market sentiment is much more volatile over time than a company's intrinsic value, and that long-term business prospects are rarely as good or bad as they seem at sentiment extremes. The Investment Manager believes market inefficiencies arise out of these situations where the news is bad, with the market unable to differentiate between companies which are experiencing cyclical (short-term) issues, and those facing more enduring structural issues.

The Investment Manager uses behavioural finance (sentiment analysis) to filter the universe of investable stocks, and then uses bottom-up fundamental analysis and environmental, social and governance ("ESG") research to identify what the Investment Manager believes are misunderstood and overlooked European companies. Fundamental research looks to determine whether the problems confronting that company are short-term in nature, through assessing industry dynamics (e.g. rivalry amongst existing competitors, barriers to entry, bargaining power of suppliers and customers, regulatory constraints) and examining traditional financial metrics to gauge business dynamics. Close attention is given to the strength of the company's balance sheet to ensure it is resilient to endure a recovery. ESG considerations are also integrated into the research process to understand the extent that ESG trends provide a tailwind or a headwind to the company's operations in the future, and/or where a company is reaching an inflection point in their ESG profile. The Investment Manager looks for companies that have either a strong ESG profile or those whose direction of travel is forward. All of this information is captured through a checklist and brought together in setting a projected price range for the stock. This is a forward-looking valuation framework which considers both the likelihood that the value of the company will rise, against the risk that it will not, creating a range-based outcome for security prices using optimistic and pessimistic scenarios.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is a market capitalisation weighted index that is designed to measure the equity market performance of the developed markets in Europe.

The Fund may invest, either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, warrants and rights, convertible securities and investments in real estate investment trusts, depository receipts (such as ADRs, GDRs and European Depository Receipts), and market access products (comprising warrants on equities, options on equities and equity swaps). The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, comprising index and currency futures, currency forwards, equity options and partly paid securities to gain exposure to the instruments listed above, in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund is expected to be reasonably diversified, generally holding 30-40 stocks across the market capitalisation spectrum, and to have a low turnover. The Fund may at times be concentrated in sectors and/or countries and as a result, may be more volatile than more broadly diversified funds. The Fund will be denominated in Euros and will not normally be hedged against currency fluctuations, although the Investment Manager may employ currency hedging on an opportunistic basis when it believes it is advisable to do so.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset

Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** the Euro;

**Business Day:** Every day that US Federal banks and the New York Stock Exchange, are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day except where English banks or exchanges are not open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [www.wellington.com](http://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Equity
- Financial Derivatives Instruments
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
E		USD 10 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class E** shares are available to certain investors until the total Net Asset Value of the Fund reaches USD100m or equivalent amount in another currency.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively

and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.70%	N/A
T	N/A		N/A	N/A
E	N/A		0.35%	N/A
D	5%		0.70%	0.70%
N	N/A		0.70%	N/A
DL	3%		0.70%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Focused European Equity Fund**

**Legal entity identifier:**  
**5493003TVM1MXDIICH55**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="checkbox"/> No
<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b>: __%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b>: __%</p>	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b></p>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund invests a portion of its assets in securities that meet the following environmental characteristic.

Companies with science-based targets and commitments to enable the Fund to seek to achieve long term net zero carbon intensity by 2050, by promoting the establishment of net zero science-based targets amongst investee companies. In relation to the net zero commitment, the Science Based Targets initiative ("SBTi") provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement - limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in companies with established or which have committed to establish a target validated by the Science Based Targets initiative (SBTi).

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*



Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund will invest in a minimum percentage of companies with targets validated by SBTi or a commitment to establish such targets, and actively engage with companies held in the portfolio to commit to set a science-based target - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.
3. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager manages the portfolio to target net zero emissions by 2050 in alignment with the Paris Agreement by investing a portion of its holdings in companies which have established, or which have committed to establish a science-based target and by actively engaging with companies held in the portfolio to commit to set a science-based target.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest in companies which have established, or have committed to establish, a science-based target and ensuring this is a minimum of 40% of the Fund's NAV (excluding cash and cash equivalents), increasing to 70% by 2030, and 100% by 2035.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 40% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

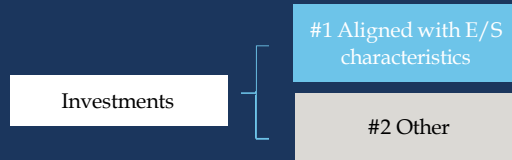
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

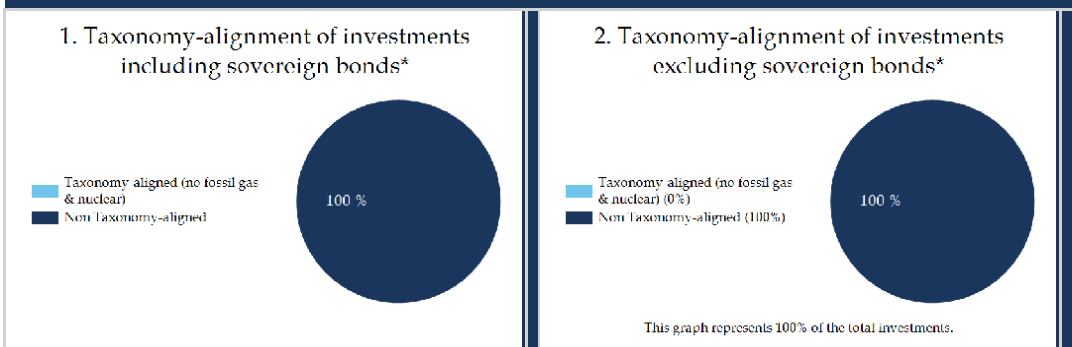
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or/ investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000668\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000668)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Global Credit Short Duration Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Global Credit Buy and Maintain Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily through investment in debt securities. The Fund will seek long-term total returns over the Bloomberg Global Aggregate Corporate 1-3 Year Index (the “**Index**”), via providing exposure to credit whilst keeping portfolio turnover low and mitigating against capital erosion over the long-term. The Investment Manager will use a combination of top down analysis of global investment and economic themes and bottom up credit analysis on individual industries and issuers to structure a Fund that seeks to hold securities to maturity unless their credit outlook deteriorates or securities with a better forecast return are identified.

To determine the “buy and maintain” suitability of individual securities, the Investment Manager establishes and scores the suitability of each security using a proprietary assessment tool. This tool maintains scores for securities in the Investment Manager’s investment universe, which are based on three factors: secular risks to the industry, cyclical nature of the industry and the underlying fundamental credit quality of the issue. These factors are important drivers of the Investment Manager’s evaluation of the issuer’s willingness and ability to service its debt for the duration of the investment horizon. In addition, when appropriate, this review may lead to the Investment Manager adding maturity restrictions if it foresees longer term uncertainties.

The investment process can be broken down into four basic steps:

1. Strategy setting: The Investment Manager will look at long term trends, analyse the economic and credit cycles, determine how they may develop and consider valuations of global markets.
2. Proprietary, bottom-up research of the issuers and securities: The Investment Manager conducts in-depth bottom-up research, evaluating cyclical indicators and industry trends, looking for industries and issuers with stable or improving credit metrics, or for companies which the Investment Manager believes will be survivors in declining industries and which the Investment Manager expects will continue to effectively service their debt.
3. Portfolio construction: The Investment Manager narrows the universe to approximately 100-200 issuers typically, through analysis and consideration of relative valuations.
4. Monitoring and Maintenance: The Investment Manager continually re-evaluates the approach, screening new information on a daily basis and undertaking periodic in-depth evaluations on individual companies and sectors. Should the underlying investment thesis of a position have deteriorated, the Investment Manager would consider a sale of the position and a reinvestment into a more suitable name, still in the context of a low turnover approach.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)



### Social

- External social factors
  - i. Social controversy

### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison and market context purposes only. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is a market capitalisation weighted index and is comprised of fixed income securities from a broad array of geographies and sectors under the corporate umbrella, with maturities between 1 and 3 years.

The Fund may invest either directly or indirectly through FDIs, in a diversified portfolio of debt securities of issuers domiciled around the world. These will comprise securities issued by government, agency, quasi-sovereign, supranational, commercial, and sub-national government issuers as well residential and commercial mortgage-backed securities, asset-backed securities, corporate bonds, real estate investment trust ("REIT") debt (which are bonds and convertible bonds issued by a REIT), both fixed and floating rate, preferred securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), warrants, hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)), bank loan assignments that qualify as Money Market Instruments and equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The Fund may also buy and sell index linked bonds and credit linked notes whose interest payments and/or payment at maturity depend on the performance of an underlying index or security. The underlying exposure of an index linked bond may be tied to a market index (such as a bond index or a credit default swap index) or an economic index (such as growth or inflation indices). The underlying exposure of a credit linked note is typically tied to a sovereign, quasi-sovereign or corporate bond issuer. In each case, the underlying exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option)). Such structured notes shall give exposure to underlying fixed income securities on either a leveraged or an unleveraged basis.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such exchange traded funds will be listed and/or traded on the markets and exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF exchange traded funds. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter derivative instruments, comprising currency, interest rate, bond and index options, interest rate, bond, index and currency futures, or options on futures, credit default swaps, index credit default swaps, interest rate, total return and currency swaps, swaptions and swaps on an index, deliverable and non-deliverable currency forwards, forwards on bonds or other debt securities, contracts for difference ("CFD") and "to-be-announced" securities to gain both long and short exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. The Fund may engage in repurchase transactions for efficient portfolio management purposes only. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will generally be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 50% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Where the Fund invests in debt securities, these debt securities may be denominated in US Dollars or other currencies. The Fund may hold cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents** in multiple currencies without restriction.

The Fund will be denominated in US Dollars. Currency exposure, from the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, is actively managed within the Fund and may include cross-currency positions which may or may not be influenced by the Fund's bond and cash equivalent positions.

The Fund will consist of different maturities. However, the interest rate duration of the Fund will be managed through the use of FDIs. The total average interest rate duration of the Fund will typically be plus or minus 0.75 years of the index. There are no limits on the duration of individual holdings, and certain defensive investment strategies may result in negative duration positions at the individual security, country and total Fund levels.

The Fund will generally be well diversified by country, currency, industry, sector, issuer and market capitalisation but may hold positions that are concentrated in this manner from time to time. Investments

will be drawn from the broad credit spectrum including those below investment grade, however the Fund's weighted average credit quality, including cash and cash equivalents is expected to be investment grade. The Fund's Net Credit Exposure to securities rated below investment-grade will not represent more than 20% of its Net Asset Value at the time of purchase. Within that allocation, a maximum of 5% of the Fund Net Asset Value may be invested in below investment-grade corporate debt issued by companies domiciled in emerging markets (for the purposes of this Fund an emerging market will be those countries that the Investment Manager considers to be an emerging market, typically those with relatively low gross national product per capital but with the potential for rapid economic growth, located in Asia, Africa, the Middle East, Latin America and the developing countries of Europe). The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**). Credit ratings for issues will be the highest of Moody's, S&P's, or Fitch's long term ratings. If a security is unrated, then an implied credit rating, as deemed by the Investment Manager, may be used.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The Global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled Financial Derivative Instruments (FDIs).

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and, the New York Stock Exchange, are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day, except where English banks or exchanges are expected not to be open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Below Investment Grade
- Capital
- Credit and Index Linked Securities
- Counterparty
- Currency
- Concentration
- Duration
- Derivatives
- Hedging
- Market
- Interest Rates
- Liquidity
- Leverage
- Operational Risk
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N		USD 5,000		
E		USD 10million		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class E** Shares available for certain investors until the total Net Asset Value of the Fund reaches USD 200m or an equivalent amount in another currency or subject to the discretion of the Company.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M – Monthly Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.15%	N/A
T	N/A		N/A	N/A
D	5%		0.15%	0.20%
N	N/A		0.15%	N/A
E	N/A		0.10%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Global Credit Short Duration Fund

**Legal entity identifier:**  
549300B8E4VMSRZZ6612

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet the following environmental characteristic.

Companies with science-based targets and commitments to enable the Fund to seek to achieve long term net zero carbon intensity by 2050, by promoting the establishment of net zero science-based targets amongst investee companies. In relation to the net zero commitment, the Science Based Targets initiative ("SBTi") provides a clearly defined pathway for companies to reduce greenhouse gas emissions. Targets are considered 'science-based' if they are in line with what the latest climate science deems necessary to meet the goals of the Paris Agreement - limiting global warming to well-below 2°C above pre-industrial levels and pursuing efforts to limit warming to 1.5°C.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's NAV invested in companies with established or which have committed to establish a target validated by the Science Based Targets initiative (SBTi).

#### *What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

#### *How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.



Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.
3. The Fund will invest in a minimum percentage of companies with targets validated by SBTi or a commitment to establish such targets, and actively engage with companies held in the portfolio to commit to set a science-based target. - PAIs: Carbon Footprint; GHG Emissions, GHG Intensity of Investee Companies.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager manages the portfolio to target net zero emissions by 2050 in alignment with the Paris Agreement by investing a portion of its holdings in companies which have established, or which have committed to establish a science-based target and by actively engaging with companies held in the portfolio to commit to set a science-based target.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest in companies which have established, or have committed to establish, a science-based target and ensuring this is a minimum of 20% of the Fund's NAV (excluding cash and cash equivalents), increasing to 55% by 2030, and 100% by 2040.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 20% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

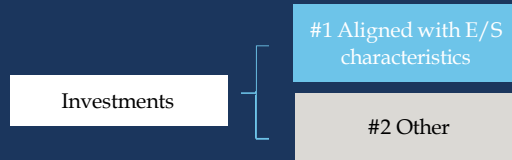
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

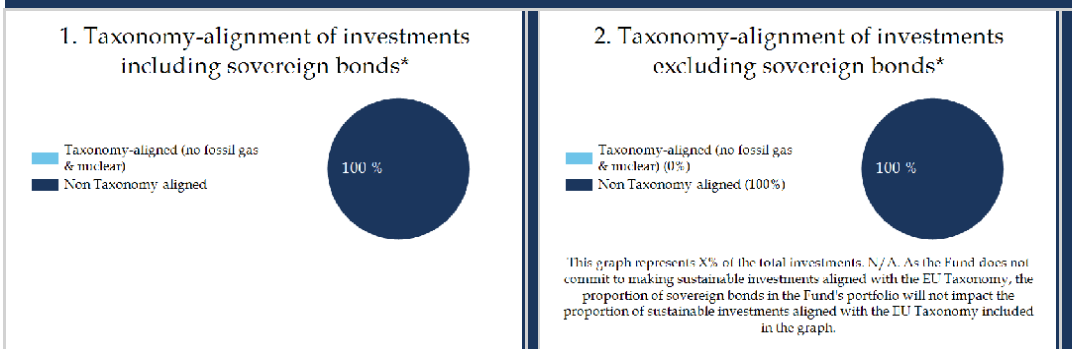
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or/ investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000039\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000039)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Sustainable Multi-Asset Total Return Income Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Sustainable Multi-Asset Total Return Income Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek a combination of long-term total returns with a regular income and actively manage downside risk.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective by investing in a broad array of global assets such as equities, government bonds, investment grade and high yield credit (such as corporate bonds).

The Fund's investment strategy is based on the Investment Manager's belief that a consistent income combined with long-term capital growth can be achieved through the active management of assets and market exposures within a disciplined risk control framework.

The Investment Manager focuses on the following when constructing the portfolio:

- **Diversification.** The Investment Manager believes that different asset classes perform better in certain market environments such as growth, low growth, inflation and stagflation (which is a situation in which the inflation rate is high, but the economic growth rate slows, and unemployment remains high). The Fund seeks to invest in a diverse set of assets, directionally matched to these environments, for example increasing allocations to government bonds in an environment of low growth and low inflation, or to equities during periods of high growth with moderate inflation. The aim of these diversification processes is to help increase the portfolio's resilience to market uncertainty. The Investment Manager employs a risk allocation process across all positions whilst targeting factors the Investment Manager believes to be aligned with the Fund's objective (for example, high quality (based on metrics including profitability, stability, growth and financial health of the company) or low volatility equities (where the fluctuation in price of securities is low)).
- **Differentiated implementation.** The Fund will seek to enhance returns by using active management and pursuing what the Investment Manager believes are more efficient market exposures than offered by traditional market-capitalisation weighted indices. The traditional methodology of these indices uses the market-capitalisation of a country's outstanding debt (for fixed income indices) or the value of the shares in the underlying companies (for equities) to determine weightings. This may result in concentrations to specific companies, sectors, or countries creating an outsized impact on index performance and risk. The global equity and global bond exposures will generally be actively managed, rather than being implemented using passive exposures via traditional indices (such as the MSCI All Country World Index). Underlying exposures may be implemented via either investment processes which look at the characteristics of the portfolio in a systematic way or fundamental research which looks at individual companies or issuers. These active exposure allocations are biased towards higher quality and more liquid assets.



- **Dynamic asset allocation.** The Fund will be tilted towards the return opportunities the Investment Manager believes are the most attractive by using a dynamic asset allocation process, which uses both quantitative (such as volatility and correlation metrics) and qualitative (such as valuation and macroeconomic research) inputs alongside current views of market environment and return opportunities. The Investment Manager will consider these factors at an asset class level and in regard to the Fund's risk posture (either increasing or decreasing risk levels) using historical perspectives as well as looking at the relative attractiveness of each in the current market environment (see the section entitled Diversification above), and adjust the portfolio accordingly. Asset allocation decisions will be primarily focused on managing Fund equity and fixed income exposures.
- **Disciplined risk management.** A strong focus will be placed on seeking to mitigate against the risk of losses, and the Fund will adopt a disciplined multi-layered approach to risk management, including structural diversification (diversification across companies, industries, sectors or markets) as described above, volatility management, drawdown controls (which are hedging strategies aimed at limiting losses if markets fall) and opportunistic hedging, which may for example be implemented using options, futures, or other permissible derivatives to aim to provide protection against a potential market event, such as a fall in equity markets.

Core to the investment process is monitoring how much the price of the assets of the Fund fluctuate and systematically adjusting holdings based on this data ('systematic volatility management'). This aims to mitigate against the loss of capital by reducing exposure to assets experiencing both rising volatility and increasing correlations with other assets (meaning that assets are increasingly moving in similar ways). Conversely when volatilities fall and correlations against other assets are reduced, exposure may be added to those asset types. This volatility management process is aimed at mitigating the negative return experiences that typically accompany rising volatility. The targeted volatility level will change based on the Investment Manager's view of prevailing market conditions.

The Fund will aim to declare a distribution of between 4%-8% of the Fund's Net Asset Value in USD on an annual basis, dependent on market conditions, however this is not guaranteed. Income will be declared and paid as described in the section of the Prospectus entitled **Distribution Policy** and, in order to deliver a regular income the potential for capital growth may be reduced and capital may be eroded in the long term.

The Fund does not consider a benchmark during portfolio construction or for performance comparison purposes.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

- Scarcity of natural resources & biodiversity
- Pollution & Waste

### Social

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

### Governance

- Lack of diversity at board of governing body level
- Corporate management practices
  - i. Inadequate external or internal audit
- The absence of appropriate and effective safeguards for employment related risks

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Fund may invest, either directly or indirectly (both long and short) through the use of FDIs (set out below) in the following instruments in pursuit of the Fund's investment objective: equity and other securities with equity characteristics, comprising shares, preferred stock, depository receipts (such as ADRs, GDRs and European Depositary Receipts), convertible securities, warrants, rights, investments in real estate investment trusts and market access products (comprising warrants on equities, options on equities and equity swaps) for securities issued by developed and emerging market companies, fixed and floating rate debt securities (for example, bonds) of issuers around the world, comprising securities in government, agency, quasi-sovereign, supranational, commercial and sub national government issuers as well as residential and commercial mortgage-backed securities, asset-backed securities, corporate bonds, covered bonds, corporate debt, preferred securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event. The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant. The Fund may invest up to 10% of its Net Asset Value in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**). The Fund may also hold interests in limited partnerships and master limited partnerships as described in the section of the Prospectus entitled **Master Limited Partnerships**, securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)), debentures and loan participation securities (debt instruments) that qualify as an eligible investment. The Fund may also invest in bank loan assignments that qualify as

Money Market Instruments and cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

The Fund may also buy and sell index linked bonds and credit linked notes whose interest payments and/or payment at maturity depend on the performance of an underlying index or security. The underlying exposure of an index linked bond may be tied to a market index (such as a bond index or a credit default swap index) or an economic index (such as growth or inflation indices). The underlying exposure of a credit linked note is typically tied to a sovereign, quasi-sovereign or corporate bond issuer. In each case, the underlying exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option, swap, forward or future)). Such structured notes may give exposure to underlying fixed income securities on a leveraged or unleveraged basis. In the event that the structured notes provide such exposure on a leveraged basis, such leverage shall be included in any global exposure calculations in accordance with the requirements of the Central Bank.

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such exchange traded funds will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, comprising currency, equity and index options, bond, interest rate and index futures or credit default, index credit default, interest rate and total return swaps, warrants, currency forwards, and "to-be-announced" securities to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. Derivatives may be used as a replacement for direct bond exposures, to hedge specific interest rate, currency or credit risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will typically be positive, meaning that long positions will generally be in greater proportion than synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 0% and 200% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. Short positions may only be taken through financial derivative instruments ("FDIs") to implement active strategies within the Fund, for hedging risk and for managing overall market exposures. The gross exposure of the Fund's short positions is not expected to exceed 150% of the Net Asset Value of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund may gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices the constituents of which include the types of securities described above in which the Fund may directly invest.

The Fund will be denominated in US Dollars. Currency exposure, from the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, is actively managed within the Fund and may include cross- currency positions which may or may not be influenced by the Fund's positions. The Fund may hold cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents** in multiple currencies without restriction.

The Fund will generally be diversified by country, currency, sector and issuer, but may hold positions that are concentrated from time to time. The Fund may invest in emerging markets (these are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia) and up to 10% of its Net Asset Value in securities traded in the Russian markets. For the purposes of this Fund, an emerging market is one that the Investment Manager considers to be an emerging market.

### **Global Exposure and Leverage**

The market risk of the Fund will be assessed within the regulatory limits specified in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)** using a risk management technique known as relative VaR. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. A custom blend of indices comprised of 40% MSCI All Countries World Index, 40% Bloomberg Global Aggregate Credit Total Return Index Value Hedged to USD, and 20% Citi World Government Bond Index 10+ years in USD terms will serve as the Index for this calculation. This blend of bonds and equities is intended to reflect the average risk exposure to general market movements targeted by the Fund. The MSCI All Countries World Index is a market capitalisation weighted and designed to measure the equity market performance of developed and emerging markets. The Bloomberg Global Aggregate Credit Total Return Index Value Hedged to USD is market capitalisation weighted and is a measure of global investment grade debt from both developed and emerging market issuers, excluding government and securitised securities. The Citi World Government Bond Index 10+ years in USD terms is market capitalisation weighted and measures the performance of global fixed-rate, local currency, and investment grade sovereign bonds with minimum maturities of 10+ years.

It is expected that the Fund will generally incur leverage at a rate of between 0% and 650% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for an investor seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio. Investors in the Fund should be aware that, as set out in the section of the Prospectus entitled **Distribution Policy**, distributions may be declared out of the capital of the Fund.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

**Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	15%	40%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

**German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'mixed' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

**GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non -Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased unless extended as specified in the contract note, or such other earlier time as will be established by the Directors from time to time. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Equity
- Financial Derivative Instruments
- Fixed Income and Other Debt Securities
- Liquidity
- Market
- Operational Risk
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N, DL	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
4 – Managed Distribution	M – Monthly

Distributions will be paid based on a distribution rate per share calculated on a periodic basis based on a projected yield.

Refer to the Distribution Policy section for a description of the distribution type and frequency of distribution payments.

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.50%	N/A
T	N/A		N/A	N/A
D	5%		0.50%	0.50%
N	N/A		0.50%	N/A
DL	3%		0.50%	1.40%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that



is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Sustainable Multi-Asset Total Return Income Fund**

**Legal entity identifier:**  
**549300EUVIT1SBJ2Y122**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristic.

1. Issuers that do not have a below-average ESG Rating, relative to their peer universe. In order to do this the Fund will invest a minimum percentage in companies with a ESG Rating of 1-3, based on Wellington Management’s proprietary ESG Ratings Framework using a rating scale of 1-5, where 1 is the highest rating. A rating of 1 is the most positive rating, indicating that the company or issuer is a leader among its peers in managing material E, S or G risks or incorporating ESG factors into its practices. A rating of 5 is the most negative, indicating that the company or issuer may be lagging its peers in managing certain material E, S or G risks or incorporating ESG factors into its practices.

2. Issuers with ESG ratings to enable the Fund to maintain an overall weighted average ESG rating that is better than a rating of 3. ESG ratings are assigned on a rating scale of 1-5 and a rating of 3 represents the middle ESG rating on a rating scale where the Investment Manager has determined the issuer is neither leading nor lagging its peers in relation to managing material E, S or G risks or incorporating ESG factors into its practices.

Through the assessment of ESG ratings and the commitments as above, the Fund promotes the following characteristics by considering the following ESG factors:

- Environmental (for companies and corporates - energy efficiency, carbon emissions and pollutants, sustainable packaging and hazardous waste, and for sovereign bonds or cash equivalents - physical climate risk, climate transition risk or natural resource risk)
- Social (for companies and corporates - corruption and bribery, labour relations, product safety and supply chain management, and for sovereign bonds or cash equivalents - inequality measures, education and labour, freedom and democracy, or social factors that relate to the downward pressures supply-side dynamics can exert on a country’s ability to generate economic growth over the long term)

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- Governance (for companies and corporates - board diversity, executive compensation, ownership)

- structure and shareholders' rights, and for sovereign bonds or cash equivalents - country's rule of law, degree of political stability, strength of institutions, or quality of policies)

3. Companies or issuers that are considered Sustainable Investments. The Fund will also maintain an allocation to Sustainable Investments, seeking investment in companies and organisations that the Investment Manager believes are contributing towards environmental or social stewardship, climate change, access to life essentials, economic development, inequality or other environmental and/or social challenges. The Investment Manager will invest at least 50% of the Fund's net assets in companies or issuers that are considered Sustainable Investments. Sustainable Investments may contribute to either environmental or social objectives in line with the environmental and social themes above. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 5% in Sustainable Investments with an environmental objective and at least 5% in Sustainable Investments with a social objective.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's net assets invested in companies with an ESG Rating of between 1-3. Since the Fund invests at least 65% of Fund's net assets in companies with an ESG Rating of 1-3, this percentage will be at least 65%.

The Fund's overall weighted average ESG rating. Since the Fund maintains an overall weighted average ESG rating that is better than a rating of 3, the Funds overall weighted average ESG rating will be between 1 and 3.

The percentage of the Fund's net assets invested in companies or issuers that are considered Sustainable Investments. The Fund will maintain at least 50% of the Fund's net assets in companies or issuers that meet these criteria.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

The Fund invests in companies or issuers that the Investment Manager believes contribute towards environmental or social stewardship, climate change, access to life essentials, economic development, inequality or other environmental and/or social challenges. In order to do this, the Investment Manager will invest a portion of its assets in companies and organisations or issuers that are deemed to contribute to any of the following environmental and/or social objectives.

- environmental objectives: such as climate risk mitigation and adaptation; sustainable product design and resilient infrastructure; responsible waste/end of product life cycle; supply chain engagement; combatting climate change through the development and promotion of alternative energy and resource efficiency, while also considering resource stewardship; energy and resource efficiency (climate change mitigation and circular economy), and drive decarbonization (climate change mitigation) and resiliency (climate change adaptation); better access to recycling, waste management, energy efficiency, alternative energy sources, testing and diagnostics.

- social objectives: such as responsible sourcing and production practices; consumer privacy and cybersecurity; sustainable investment in technology, innovation, and human capital; increasing access to affordable housing and improving access and outcomes related to health. Life essentials also addresses social and environmental objectives through increasing access to clean water & sanitation and sustainable agriculture & nutrition; bridging the digital divide, increasing access to education and job training, expanding financial inclusion, and increasing safety and security; Increasing innovation and the efficiency of all available factors of production in areas such as advances in use of technology, promotion of innovation, institutional reform; Improving living standards and broadening the range of beneficiaries of economic development in areas such as improving access to health care, education and finance.

Companies may be assessed to contribute to the environmental or social objectives using a number of underlying methodologies, including one or more of the below:

- To assess whether the company's products or services provide a climate mitigation or adaptation solution a company must meet the Investment Manager's criteria for climate stewardship around climate mitigation and adaptation. In order to be included in the portfolio, more than 50% of a company's revenues must be tied to mitigation and/or adaptation activities.

- To assess companies that contribute to one or more social stewardship criteria (such as responsible sourcing and production practices; consumer privacy and cybersecurity; sustainable investment in technology, innovation, and human capital) or environmental stewardship criteria (such as sustainable product design and resilient infrastructure; responsible waste/end of product life cycle; supply chain engagement). This contribution is evaluated by mean of a proprietary scorecard. The scorecard will quantify otherwise qualitative critical stewardship attributes such as executive skill and alignment and the effectiveness of the board. The Investment Manager anticipate the scorecard framework to evolve over time given ESG/stewardship issues are not static;

- The Investment Manager takes into account both quantitative and qualitative considerations to fulfill each of the following three impact criteria, using a bottom-up process for identifying and analyzing candidate issuers for investment. In defining the opportunity set: Impact activity must be central to the issuer. For equities, this is the materiality of impact activities to a company's overall activity (which needs to account for 50% or more of revenues). In the case of use-of-proceeds bonds, proceeds must be used for an activity that the Investment Manager deems to be related to one of its Impact Themes (Materiality); The Investment Manager evaluates each issuer's value proposition, the specific needs it addresses, competitor product and services, and the degree to which alternative solutions already exist (Additionality); The impact case must be quantifiable. The Investment Manager uses company or issuer reports and proprietary models to develop individualized KPIs to understand the nature of the impact generated by the issuer, its alignment with the Fund's Impact Themes, and progress over time (Measurable KPIs).

- In order to assess companies whose products, services or capital provide for energy and resource efficiency (climate change mitigation and circular economy), and drive decarbonization (climate change mitigation) and resiliency (climate change adaptation), such companies may be categorised into two categories "environmental tailwind" (companies where more than 50% of their current revenue is tied to the environmental categories), or "environmental improvers". Environmental improvers are those with less established climate-related revenues (<50%), but where the Investment Manager's bottom-up analysis indicates that either the company is shifting their portfolio of products, services or capital to greener solutions resulting in an increase in their revenue streams related to the environmental categories, or the company reports KPIs on their products, services or capital which the investment manager assesses have or will have a material and measurable positive impact with respect to the environmental categories.

- Where the sustainable objective relates to set themes (such as innovation, sustainability and inclusion), which themselves align with the environmental or social objectives described above, the Fund may assess companies according to the threshold for theme purity where a minimum of 50% of the revenue is aligned with the theme's objective (or the Investment Manager projects that the total revenue that aligns with the theme will grow to at least a minimum of 50% in the near future).

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign Principal Adverse Impacts, as appropriate for the asset type, and as listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs").

PAIs are assessed quantitatively, according to third party data, or qualitatively by the Investment Manager's research analysts and investment teams using internal research and analysis regarding issuer activities.

Where PAI data is lacking or unavailable, and as applicable to the asset type, the Investment Manager will conduct further due diligence and qualitatively assess the issuer's activities, processes or policies related to climate, environmental, social and/or anti-bribery/anti-corruption matters to determine that the issuer is not doing significant harm.

**PAI Criteria**

Where the PAIs reflect a quantitative data point and such quantitative data is available, each Sustainable Investment is compared against quantitative thresholds set by the Investment Manager as applicable to the asset type. The thresholds may be determined by setting express conditions or fixed numerical thresholds for a given PAI. For example, companies which produce controversial weapons are excluded in accordance with the Exclusions Policy, while the greenhouse gas emissions PAI threshold is applied to issuers included within the Climate Action 100+ list as the largest corporate greenhouse gas emitters. The Climate Action 100+ list is comprised of corporate issuers representing approximately 80% of global corporate GHG emissions. Companies on the Climate Action 100+ list which have reported against TCFD standards and have stated interim and long-term decarbonization / net zero goals are not deemed to be doing significant harm.

Certain PAIs are evaluated relative to industry peers and the worst companies in those industries will set the standard for determining significant harm. Where the Investment Manager has determined that industry differentiation is less meaningful, thresholds will be set in the context of all issuers. As an example, the carbon footprint and greenhouse gas intensity of investee companies PAI's are evaluated relative to industry peers, and the threshold is reached where companies are determined to be among the highest within any of the MSCI-defined Global Industry Classification Standard (GICS) Level 3 industries with respect to greenhouse gas intensity or carbon footprint.

Where the Investment Manager has determined that differentiation is less meaningful or for PAIs which are more qualitative in nature (e.g. PAIs relating to the UNGC principles and the OECD Guidelines) significant harm is assessed by evaluating, among others, companies' activities, management policies and practices or unresolved controversies using third party data. For some indicators (e.g. board gender diversity and gender pay gap evaluation), the Investment Manager looks at third party data regarding, among others, discrimination and workforce diversity controversies along with evaluation of the presence of women in the decision-making bodies of the company.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Investment Manager uses PAI data in its investment research tools, portfolio management tools and trading compliance system. Issuers who fail to pass the Investment Manager’s criteria may not be held in portfolios and designated as Sustainable Investments. Assessment against the PAIs for the purpose of ensuring that Sustainable Investments do not significantly harm environmental or social objectives includes the following:

- Exclusions with respect to the production of controversial weapons, revenues associated with thermal coal extraction or power generation and revenues associated with the production and generation of oil sands are applied in accordance with the Exclusions Policy in order to avoid significant activities associated with controversial weapons and fossil fuels PAIs.
- The Investment Manager uses third party data to understand the negative impact an issuer may have on a given PAI and sets pre-defined thresholds within each PAI which are applied on a pre-trade basis as applicable for the asset class. Where third party data indicates that an issuer is potentially doing significant harm according to the PAI threshold, the Investment Manager conducts additional due diligence using a variety of internal research and external data to determine whether the data is accurate.
- Where third party data is unavailable regarding a specific PAI, the Investment Manager conducts additional due diligence using a variety of internal research and external data (including by looking at public disclosures or reporting or via outreach directly to the issuer itself) to assess that the issuer is not doing significant harm.
- Where third party data indicates that the thresholds set for one or more PAIs have been reached and such data is found to be correct, the Investment Manager may further evaluate and engage with the issuer to ensure the issuer is aware of the harm or identified controversy and is taking active steps to mitigate or remediate such harm including with respect to transitioning away from potentially harmful activities. Where PAI data may not be relevant to investments in specific issuer projects such as use-of-proceeds bonds, the Investment Manager may also further evaluate the specific nature of such projects or activities in order to confirm that such activities are not being carried out in a way that causes significant harm.
- Where an issuer is confirmed to have reached a relevant PAI threshold and is not engaging with the Investment Manager to address it, the Investment Manager will not invest in such an issuer or will seek to divest in the best interests of Fund investors.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested as part of the Investment Manager’s process to identify Sustainable Investments. Assessment of management policies and practices are necessary to determine alignment. Misalignment with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights may be determined where the Investment Manager identifies UN Global Compact non-compliance, inadequate policies and/or unresolved controversies.

Issuers assessed to be in breach of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of human Right are not eligible to be classified as Sustainable Investments.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.





## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

The Fund's Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign PAIs to determine that the Sustainable Investments do not cause significant harm to any environmental or social sustainable objective. In addition, by virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager will invest in a minimum percentage in companies with a ESG Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund will also invest in issuers with ESG ratings to enable the Fund to maintain an overall weighted average ESG rating that is better than a rating of 3. ESG ratings are assigned on a rating scale of 1-5 and a rating of 3 represents the middle ESG rating on a rating scale where the Investment Manager has determined the issuer is neither leading nor lagging its peers.

In order to meet the above environmental and/or social characteristics, the Investment manager assigns issuers an ESG Rating, using a rating scale of 1-5, where 1 is the highest rating. A rating of 1 is the most positive rating, indicating that the company or issuer is a leader among its peers in managing material E, S or G risks or incorporating ESG factors into its practices. A rating of 5 is the most negative, indicating that the company or issuer may be lagging its peers in managing certain material E, S or G risks or incorporating ESG factors into its practices.

This is based on Wellington Management's proprietary ESG Rating framework as defined in the Prospectus for companies and corporates. Sovereign bonds, and where appropriate cash equivalents such as treasury bills, will be assigned a ESG rating according to the appropriate Wellington Management's proprietary ESG framework that best represents the region of the issuer. ESG ratings aim to combine Environmental indicators (such as physical climate risk, climate transition risk or natural resource risk);

Social indicators (such as inequality measures, education and labour, freedom and democracy, or social factors that relate to the downward pressures supply-side dynamics can exert on a country's ability to generate economic growth over the long term); Governance indicators (such as a country's rule of law, degree of political stability, strength of institutions, or quality of policies) into a single data point which can be used in the assessment of the environmental, social and governance activities and attributes of the sovereign issuer.

The Investment Manager will invest at least 50% of the Fund's net assets in companies that are considered Sustainable Investments. The Fund invests in companies or issuers that the Investment Manager believes contribute towards environmental or social stewardship, climate change, access to life essentials, economic development, inequality or other environmental and/or social challenges. In order to do this, the Investment Manager will invest at least 50% of its assets in companies and organisations or issuers that are deemed to contribute to any of the following environmental and/or social objectives.

- environmental objectives: such as climate risk mitigation and adaptation; sustainable product design and resilient infrastructure; responsible waste / end of product life cycle; supply chain engagement; combatting

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.



climate change through the development and promotion of alternative energy and resource efficiency, while also considering resource stewardship; energy and resource efficiency (climate change mitigation and circular economy), and drive decarbonization (climate change mitigation) and resiliency (climate change adaptation); better access to recycling, waste management, energy efficiency, alternative energy sources, testing and diagnostics.

- social objectives: such as responsible sourcing and production practices; consumer privacy and cybersecurity; sustainable investment in technology, innovation, and human capital; increasing access to affordable housing and improving access and outcomes related to health. Life essentials also addresses social and environmental objectives through increasing access to clean water & sanitation and sustainable agriculture & nutrition; bridging the digital divide, increasing access to education and job training, expanding financial inclusion, and increasing safety and security; Increasing innovation and the efficiency of all available factors of production in areas such as advances in use of technology, promotion of innovation, institutional reform; Improving living standards and broadening the range of beneficiaries of economic development in areas such as improving access to health care, education and finance.

Companies or issuers may be assessed to contribute to the environmental or social objectives using a number of underlying methodologies applicable to each respective environmental or social objectives as described above. Such methodologies may include assessing companies based on revenue thresholds; using proprietary scorecard in relation to criteria's relevant to certain objectives; bottom-up analysis to assess materiality of impact activities; or alignment to set themes using revenue thresholds.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The Fund will invest at least 65% of Fund's net assets in companies with an ESG Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund will maintain an overall weighted average ESG rating of the Fund that is better than the ESG rating of 3.

At least 50% of the Fund's net assets are invested in companies that are considered Sustainable Investments.

***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

In line with the Fund's Sustainable Investments approach, The Fund invests in companies that the Investment Manager believes contribute towards environmental or social stewardship, climate change, access to life essentials, economic development, inequality or other environmental and/or social challenges by investing at least 50% of the Fund's net assets in companies that are considered Sustainable Investments. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 5% in Sustainable Investments with an environmental objective and at least 5% in Sustainable Investments with a social objective.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

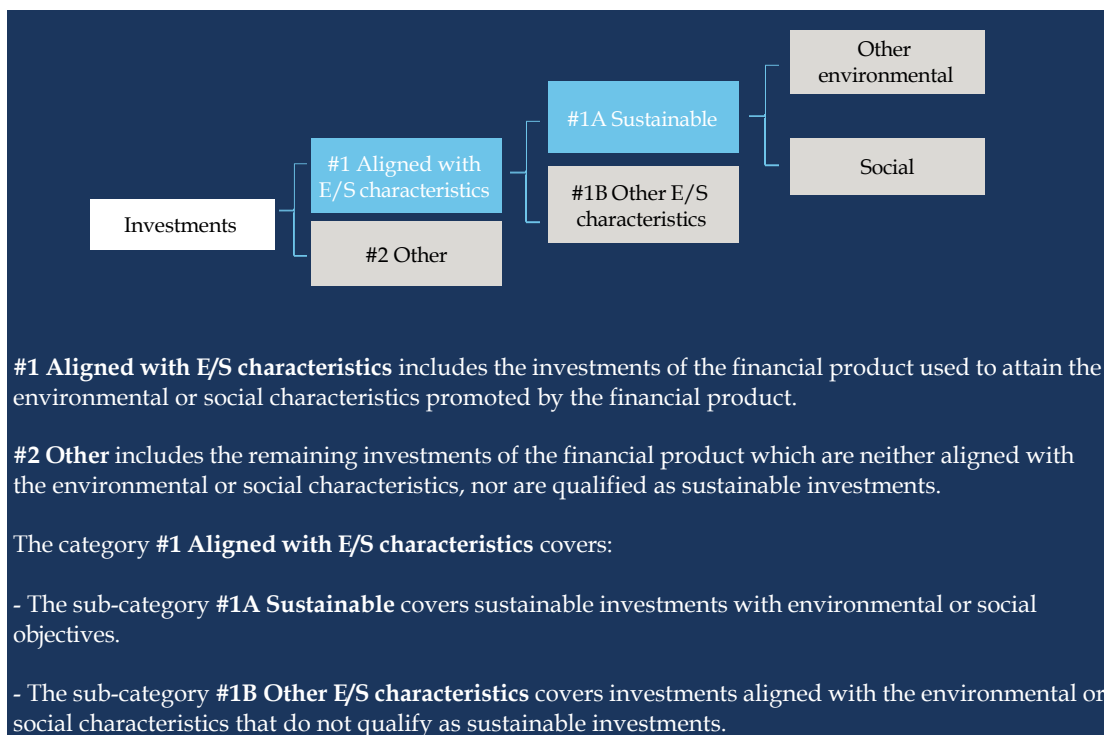
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Certain derivatives are used for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund and are considered as part of the calculation for the overall weighted average ESG rating.

In addition, the Investment Manager may use derivatives in order to gain exposure to securities of companies that they believe contributes towards environmental or social stewardship, climate change, access to life essentials, economic development, inequality or other environmental and/or social challenges and are considered sustainable investments.



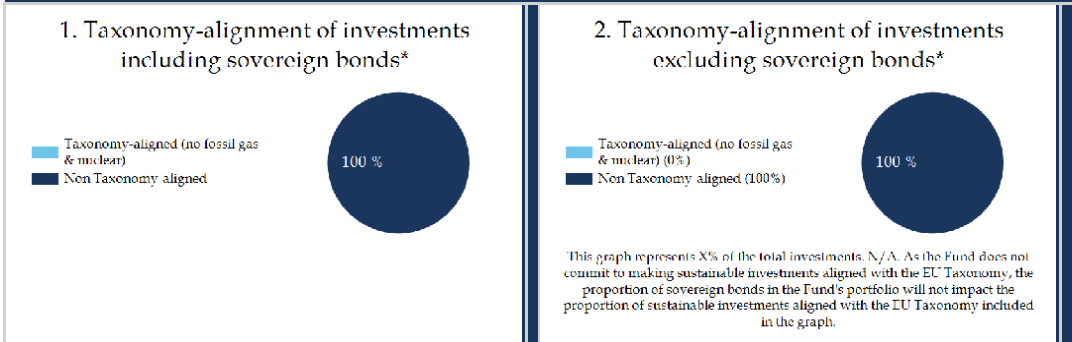
### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

Although the Fund commits to invest in Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of EU Taxonomy-aligned investments is 0%.

*Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas       In nuclear energy
- No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.


*What is the minimum share of investments in transitional and enabling activities?*

Not applicable. Although the Fund commits to invest in Sustainable Investments within the meaning of the SFDR, the minimum share of investments in transitional and enabling activities is 0%.


 are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

 **What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

Although the Fund commits to make Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of such investments with an environmental objective not EU Taxonomy-aligned is 5%. These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.

 **What is the minimum share of socially sustainable investments?**

Minimum 5% of the Fund's net assets are invested in socially sustainable investments.

 **What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under '#2 Other' may include cash and cash equivalents for liquidity purposes, derivatives for hedging, and/or investment purposes (such as gaining exposure to a security, to create leverage and/or a short position, and efficient asset allocation) or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000667\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000667)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Opportunistic Emerging Markets Debt Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Opportunistic Emerging Markets Debt Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the JP Morgan Emerging Markets Bond Global Index (the "Index") and achieve the objective, primarily through investment in a diversified portfolio of emerging markets debt securities and currency instruments. The Investment Manager uses an investment approach that seeks to take advantage of opportunities across the emerging markets debt securities spectrum, including hard currency (commonly referenced as bonds denominated in USD or other developed market currencies) and local currency denominated sovereign, quasi-sovereign, and corporate debt, currencies and derivatives.

The Investment Manager combines comprehensive top-down analysis with detailed bottom-up country and company research to identify the best investment opportunities. The Investment Manager's review of individual countries includes both quantitative (statistical factors such as debt sustainability, relative health of the banking sector, exchange rate regime and level of capital reserves) and fundamental factors (those that are core to each country, for example political risk, fiscal outlook and monetary authority credibility).

The Investment Manager employs the following investment philosophy in the ongoing management of the Fund:

- Emerging markets must be approached from a global perspective. Developed market events, trends, and policies can have a meaningful impact on emerging markets economies due to the trade and capital flow linkages. To understand emerging markets you must understand where each country fits in the broader global landscape.
- Disciplined research can uncover market mispricings. Risks and opportunities in emerging market countries are often misunderstood by market participants due to the size, diversity, and complexity of the market. The performance of countries and sectors can diverge for a range of reasons such as their stage of capital market development, stage in the economic cycle or policy-maker skill. Disciplined research that incorporates both quantitative and qualitative factors can be used to capture unrecognized value in this market.
- Risk must be managed in a multi-dimensional way, using both quantitative and qualitative risk analysis.

When managing the Fund, the Investment Manager uses the following four key components when building the Fund:

1. **Broad Strategy:** an assessment of the global economic, liquidity and market conditions that are likely to have a material impact on emerging markets debt asset class valuations. More specifically, the Investment Manager looks at the health of the global economy, global central bank policies, broad economic and/or political trends that could drive the performance of emerging markets as a group, and the relative value of emerging market debt versus other investment opportunities. This assessment is used to set the overall risk stance of the portfolio.

2. Research: A combination of deep quantitative research (looking purely at financial and economic data) and fundamental research (incorporating a more holistic analysis of economic and political information) is carried out to find ideas across hard currency sovereign debt, corporate debt, local interest rates, and currencies. Quantitative modelling provides the Investment Manager with a consistent, baseline view of each country and currency. This quantitative approach helps facilitate comparisons across countries, issues, and currencies. The output of the Investment Manager's models is then evaluated by the Investment Manager's team of experienced sovereign analysts who conduct fundamental research to identify more qualitative factors not captured by the quantitative models that could have a meaningful impact on each country's economic and financial market performance. The analysts then make investment recommendations to the Investment Manager based on the full set of research.
3. Portfolio construction: The Investment Manager will select and scale positions from those recommendations based on the degree of conviction that it has in a particular idea, factoring in characteristics such as expected return, expected volatility and liquidity, as well as the Fund's overall risk and return objectives and investment guidelines.
4. Risk management: An in-depth evaluation of exposures is carried out by region, country, currency and sector and at the total Fund level. The Investment Manager will also conduct sensitivity analysis to various market factors (looking at the sensitivity of one factor to changes in others) and scenario analysis across different market environments (looking at different possible outcomes) with the aim of ensuring that the portfolio is constructed in a manner that is consistent with the risk stance targeted at the outset of the process.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.



Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance and duration comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how currency and issuer weightings differ from the Index, however this should not be expected to limit the Fund's ability to achieve long-term total returns in excess of the Index and/or performance that is materially different from the Index. The Index tracks total returns for US Dollar-denominated debt instruments, both fixed and floating rate, issued by emerging market sovereign and quasi-sovereign entities.

The Fund will invest, either directly or indirectly through the types of financial derivative instruments ("FDIs") more fully described in the section of the Prospectus entitled **Types and Description of FDIs** for investment purposes and for efficient portfolio management, including hedging against risk. FDIs will primarily provide both long and short exposure to emerging markets fixed income securities, currencies and interest rates. The Fund may also invest, in the same manner, in bonds issued by sovereign, quasi-sovereign agency, supranational and sub national government issuers, mortgage, commercial mortgage, and asset-backed securities, hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, corporate debt, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), global depository notes, warrants, loan participation securities that qualify as an eligible investment by the Fund (including, but not limited to, trade finance loan participations) and, in addition, bank loan assignments that qualify as Money Market Instruments, and credit and index linked securities, which are debt securities of companies whose interest payments and/or payment at maturity depend primarily on the performance of one or more underlying credit exposures or market indices. A particular credit-linked security's underlying credit exposure may be to a sovereign, quasi-sovereign or corporate issuer. Underlying index exposures may be to an index tied to a country's economic exposure, debt or currency. In each case, the underlying credit or index exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option)), as well as other debt securities issued by public or private issuers, both fixed- and floating-rate, including forward contracts on such securities, and may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 75% and 200% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may invest.

The Fund may invest in any country which is considered by the Investment Manager to be an emerging market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. Developed market exposures are also permitted. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**) and may make substantial investment in securities traded on Russian markets.

As a result of the invasion of Ukraine, the Investment Manager will not make any new purchases of Russian securities for the Fund without giving notice to the shareholders in the Fund at that time. In future, subject to international sanctions being lifted, and such notice being given, the Investment Manager may in its discretion consider making new investments in Russia securities for the Fund.

Currency exposure to multiple currencies will be taken on an opportunistic basis. Currency exposure to both emerging markets and developed countries, including cross-currency positions, which are not related to the Fund's bond and cash equivalent positions, will be assumed. Currency instruments will be used to both manage risk and seek to enhance returns on an opportunistic basis.

The Fund's maximum exposure to corporate debt is expected to be 50% of the Net Asset Value of the Fund, and to local debt 100% of the Net Asset Value of the Fund.

The Fund generally will be diversified by country, currency and issuer but may hold concentrated positions from time to time. The Fund is expected to have a moderate to high turnover.

There is no limit on the duration of individual Fund holdings; however, duration at the Fund level is expected to be limited to the duration of the Index +/- 2 years. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Fund's Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 4 years, and will not be higher than 8 years.

Investments will be drawn from the broad credit spectrum. The Fund's weighted average credit quality, including cash and cash equivalents may be below investment grade. There will be no limitations on the credit quality of individual securities or currencies in the Fund.

The Fund will invest in both US Dollar-denominated securities and in securities denominated in currencies other than the US Dollar.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as relative VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed twice the VaR of the Index. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

It is expected that the Fund will generally incur leverage at a rate of between 0% and 600% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. Where FDIs are used for hedging purposes or are themselves hedged against equal and opposite trades, the sum

of gross notional values of FDIs may not reflect the true economic risk of the Fund. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. If the expected level of leverage were calculated taking into account netting of equal and opposite foreign exchange forward contracts, and excluding the share class hedging, the level of leverage would be expected to be lower and generally between 0% and 150% of the Fund's Net Asset Value. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	20%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day is a Dealing Day;

A list outlining the expected Non -Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the third Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within three Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia

- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, NOK, HKD and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### Distribution Payments

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	M - Monthly Q - Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Name	Class	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee	Performance Fee
S		N/A		0.55%	N/A	N/A
T		N/A		N/A	N/A	N/A
D		5%		0.55%	0.55%	N/A
N		N/A		0.55%	N/A	N/A
DL		3%		0.55%	1.10%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Opportunistic Emerging Markets Debt Fund

**Legal entity identifier:**  
PTMS64OT6ELV6NLCKG56

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund invests a portion of its assets in securities that meet the following environmental or social characteristic.

The Fund will invest in issuers with an ESG rating and maintain an overall weighted average ESG Rating, in excess of the JP Morgan Emerging Markets Bond Global Index (the "Index").

Whilst the Index is used for ESG Rating comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The difference between the Fund's weighted average ESG Rating and that of the Index.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these

restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager monitors the weighted average ESG Rating of the issuers and ensures that it remains better than that of the Index, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average ESG Rating in excess of the Index.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

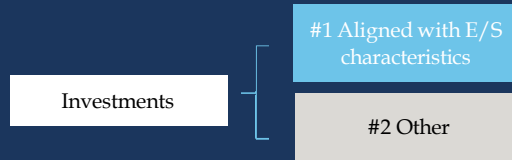
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Certain derivatives with an ESG Rating are used for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund and are considered as part of the calculation of the overall weighted average ESG Rating, which the Fund has committed to ensuring is in excess of the Index.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for ESG Rating comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000048\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000048)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington US Dynamic Equity Fund**

This Fund is subject to the disclosure requirements of Article 6 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington US Dynamic Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the S&P 500 Index (the "Index") and achieve the objective by investing primarily in a concentrated, high conviction portfolio of equity securities of US companies in combination with broad U.S. market exposure as represented by the Index.

The Fund's investment in individual companies is based on the belief that changes in earnings expectations drive stock prices. The individual companies in the portfolio will generally be those that are demonstrating earnings growth at accelerating or sustained high levels, and therefore the portfolio may have a natural growth style bias. The amount of the portfolio dedicated to individual companies fluctuates per the Investment Manager's highest conviction at a particular time. Companies selected will be those trading at valuations that the Investment Manager views as reasonable based on a company's future earnings and growth trajectory versus the market. Therefore, the number of such companies varies over time as a result of market and company valuations, expected economic growth and individual company fundamentals. The residual proportion of the portfolio that is not invested in individual equity securities will be invested in the broad market with exposure primarily taken using S&P 500 index futures. This exposure will vary over time, and could be up to 90% of the Funds Net Asset Value during certain market conditions, however the Fund will maintain at least 10% of the Net Asset Value in individual equity securities. The Fund will invest in securities across all market capitalizations and sectors and turnover may vary widely as stock selections change. The Fund may also hold up to 10% of Net Asset Value in non-US companies, including those in emerging markets, from time to time.

The Fund will apply the Company's Exclusion Policy with respect to the portion of the Fund not invested in S&P 500 index futures, further details of which can be found in the section of the Prospectus entitled **Exclusions**.

The investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Fund does not consider the adverse impacts of its investment decisions on Sustainability Factors.

The Index serves as a reference benchmark for performance comparison purposes, as well as providing broad US market exposure as stated above. Whilst individual equity securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which individual equity securities differ from the Index. However, the residual portion of the Fund invested in Index futures will naturally closely track the Index. The Index is designed to measure performance of the broader US equity market.

The Fund may invest, either directly or indirectly through Financial Derivative Instruments ("FDIs"), in equity and other securities with equity characteristics, comprising shares, preferred stock, warrants and rights, convertible securities and investments in real estate investment trusts, depository receipts (such as ADRs, GDRs and European Depository Receipts), and market access products (comprising warrants on equities, options on equities and equity swaps). The use of FDIs forms an important part of the investment

strategy and the Fund is expected to have significant exposures to cash and/or liquid fixed income securities for collateral and cash management purposes and as a result up to 90% of the Fund's Net Asset Value may be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**. The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may buy and sell exchange-traded and over-the-counter FDIs comprising the market access products mentioned above, as well as index futures and currency forwards to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund may be concentrated in a relatively small number of securities, industry sectors and/or countries and as a result, may be more volatile than more broadly diversified funds. The Fund will not normally be hedged against currency fluctuations, although the Investment Manager may employ currency hedging on an opportunistic basis to protect or enhance the value of the Fund's holdings when it believes it is advisable to do so.

The indices to which the Fund may gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- External social factors
  - i. Social controversy

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**



The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

**Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	5%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

**German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'mixed' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com.

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Class T Shares will commence 21 March 2024 and close on 20 September 2024.

## RISK FACTORS

Potential investors' attention is drawn to the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Equity
- Financial Derivatives Instruments

- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or
S		USD 1 million	USD 1,000	
T		USD 5 million		
E, EN		USD 10 million		
D, N		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class E Shares** are available to certain investors until the total Net Asset Value of the Fund reaches USD100m or equivalent amount in another currency.

**Class EN Shares** are available to investors who are acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S or E Shares. EN Shares are available until the total Net Asset Value of the Fund reaches USD100m or equivalent amount in another currency. No distribution fee is paid in respect of the Class EN Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee, Distribution Fee and Performance Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below. The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears. The Performance Fee, if applicable, is generally crystallized at the Fund's fiscal year end and paid shortly thereafter. The Performance Fee Type applicable to this Fund is Performance Benchmark. Please refer to the **Performance Fees** section of the Prospectus for more detail.

<b>Share Class Name</b>	<b>Maximum Preliminary Charge*</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>	<b>Performance Fee</b>	<b>Performance Benchmark</b>
S	N/A	0.20%	N/A	20%	S&P 500 Net

T	N/A	N/A	N/A	N/A	N/A
D	5%	0.20%	0.60%	20%	S&P 500 Net
N	N/A	0.20%	N/A	20%	S&P 500 Net
E	N/A	0.10%	N/A	20%	S&P 500 Net
EN	N/A	0.10%	N/A	20%	S&P 500 Net

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, and EN where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Strategic European Equity Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Strategic European Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI Europe Index (the "Index") and achieve the objective by investing predominantly in a diversified portfolio of European-domiciled companies that the Investment Manager believes will enjoy earnings and cash flow growth that are greater than the average earnings and cash flow growth of constituents of the Index.

The Investment Manager selects stocks by conducting research into individual companies, for example by analysing revenues, earnings and profits to determine a company's underlying value and potential for future growth and longer-term rewards. The Investment Manager takes a 'bottom-up' approach, which focuses on the analysis of individual stocks. The Investment Manager believes that the market's short-termism creates opportunities for long-term investors investing in companies with the characteristics reflected below. The Fund will generally invest in companies where:

- The Investment Manager is able to identify a structural growth driver (circumstances which are causing a change in the way a company, an industry or market is operating therefore providing potential opportunities for investments to increase in value). This may be company specific or driven by changes in an industry or country, and may be supported by external factors (e.g. favourable political changes, increased automation or regulatory change), market penetration, brand strength, technological leadership and superior business models.
- The Investment Manager perceives the company as having a strong competitive advantage, typically assessed using a range of elements such as the threat of new entrants, the bargaining power of buyers and suppliers, the threat of substitutes and competitive rivalry.
- The relative valuation is attractive. Relative valuation assessments consider the price of a stock based on its historical range and relative to its peers, and not only play a role in the stock selection process but also in the sell-discipline; the Investment Manager may sell a stock if they believe the price no longer justifies the long-term growth prospects.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors

- i. Child & Forced Labour
- ii. Human Rights
- External social factors
  - i. Social controversy

**Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is a market capitalisation weighted index that is designed to measure the equity market performance of the developed markets in Europe. The Index does not take into account the environmental and social characteristics referenced above.

The Fund may invest, directly or indirectly through the use of FDIs (both long and short), in equity and other securities with equity characteristics issued by the companies described above, such as shares, preferred stock, warrants, depository receipts (such as ADRs, GDRs and European Depository Receipts), dividend right certificates (i.e. equity securities that confer the right to participate in profit and liquidation proceeds and certain other rights in the issuer, but do not confer voting rights) and investments in real estate investment trusts that are considered to be Transferable Securities. These investments may be made in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

Provided such investments are deemed by the Investment Manager to be consistent with the investment objective and investment strategy described above, the Fund may also invest in other securities such as: exchange-traded funds qualifying as collective investment schemes (such exchange-traded funds being subject to a maximum of 10% of the Net Asset Value of the Fund); and cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

The Fund is expected to be reasonably diversified, generally holding 50 to 80 securities invested across the market capitalisation spectrum with a bias to mid and large capitalisation companies and to have low levels of turnover. Sector, country and region weights are a result of bottom-up security selection and are typically unconstrained. Generally, the Fund will be fully invested with a normal cash level of 5% of the Net Asset Value or less. The Fund may invest up to 10% of its Net Asset Value in emerging markets. For the purposes of this Fund, an emerging market is one that the Investment Manager considers to be an emerging market



The Fund will be denominated in Euros and normally will not be hedged against currency fluctuations, although the Investment Manager may employ currency hedging to protect or enhance the Euro value of its holdings when it believes it is advisable to do so.

Not more than 10% of the Fund's Net Asset Value will be invested in securities which are not listed or dealt on a market which is regulated, operating regularly, recognised and open to the public and included in the list of exchanges and markets set out in Appendix I of the Prospectus from time to time.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

## German Taxation

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** the Euro;

**Business Day:** Every day that US Federal banks, the New York Stock Exchange, banks and exchanges in England are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Class DL Shares will commence on 23 April 2024 and will close on 22 October 2024.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, DL, N		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.70%	N/A
T	N/A		N/A	N/A
D	5%		0.70%	0.75%
N	N/A		0.70%	N/A
DL	3%		0.70%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Strategic European Equity Fund

**Legal entity identifier:**  
IWKNZB1ZFKFO381L0S61

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

- Companies with an average or above-average S Rating, relative to their peer universe.
- Issuers that are screened to enable the Investment Manager to implement the following exclusions. The Fund will not invest directly in the securities of any issuer identified as being principally engaged in the production of thermal coal (mining and power generation), oil sands extraction, nuclear warheads and missiles, and also excludes controversial weapons.

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The percentage of the Fund's net assets invested in companies with a S Rating of 1-3.

The number of securities of any issuer held identified as being principally engaged in the production of thermal coal (mining and power generation), oil sands extraction, nuclear warheads and missiles, and also controversial weapons.

#### *What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

*- How have the indicators for adverse impacts on sustainability factors been taken into account?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.
2. The Fund will systematically exclude companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Investment Manager will invest a minimum of the Fund's net assets in companies with a S Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Investment Manager also applies screening to implement exclusions. The Fund will not invest directly in the securities of any issuer identified as being principally engaged in the production of thermal coal (mining and power generation), oil sands extraction, nuclear warheads and missiles, and controversial weapons.

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will invest at least 60% of the Fund's net assets in companies with a S Rating of 1-3, using a rating scale of 1-5, where 1 is the highest rating.

The Fund will not invest directly in the securities of any issuer identified as being principally engaged in the production of thermal coal (mining and power generation), oil sands extraction, nuclear warheads and missiles, and excludes controversial weapons.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 80% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.



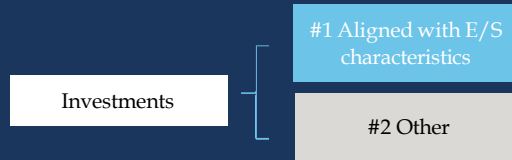
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

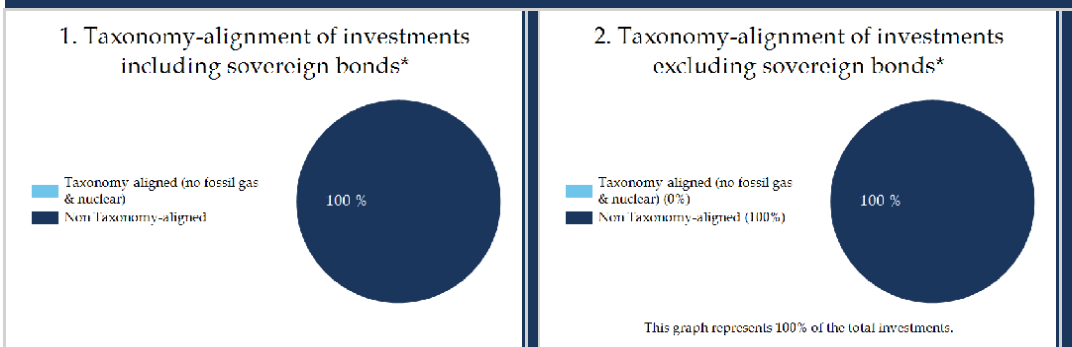
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
  - In fossil gas
  - In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund’s environmental or social characteristics.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000051\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000051)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Euro High Yield Bond Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Euro High Yield Bond Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the ICE Bank of America Euro High Yield Constrained Index (the "Index") and achieve the objective, primarily through investment in debt securities denominated in European currencies issued worldwide. The Fund's investment approach is based on a combination of the analysis of the credit profile of individual high yield issuers and country-level macro-economic research. Total returns will be sought through income and capital appreciation.

The Fund is denominated in Euro and the majority of debt securities held will be denominated in Euro with any non-Euro exposures in the Fund generally hedged back to Euro. The Fund will also primarily invest in debt securities which are considered by the Investment Manager to be below investment grade.

The Investment Manager employs the following investment philosophy in on-going management of the Fund and seeks to generate excess returns over the long term by:

- Identifying companies with sustainable competitive advantages which allow them to sustain margins and cash flows.
- Exercising caution in sectors with significant credit growth or increasing capacity, for example where supply is growing faster than demand.
- Being value driven and opportunistic, looking for investment opportunities in out-of-favour areas of the market.

Top-down and bottom-up research inputs are combined to construct a portfolio with positions sized relative to the Index, either underweight or overweight, based on the level of conviction around an investment idea.

The Investment Manager has a disciplined approach to risk management, using internally developed risk systems to analyse and manage the risk of the Fund. Two key tenets of the Fund construction philosophy are diversification and ensuring larger position sizes in securities are linked to the strength of the Investment Manager's conviction in the investment opportunity.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors

- i. Child & Forced Labour
  - ii. Human Rights
- External social factors
  - i. Social controversy

**Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index may be considered during portfolio construction and is used for performance comparison purposes. Fund securities may be components of the Index but are not expected to have similar weightings. The Investment Manager uses broad tolerance ranges when considering how industry and issuer weightings, as well as overall interest rate duration, differ from the Index, however this should not be expected to limit the Fund's ability to achieve performance that is materially different from the Index. The Index tracks the performance of Euro-denominated, below investment grade corporate debt publicly issued in markets around the world and is modified capitalisation weighted, with the largest issuers capped at 3% of the weight of the total index with the excess weight redistributed equally amongst the issuers under that cap.

The Fund will invest, either directly or indirectly (both long and short) through the use of FDIs, in high yield (i.e., below investment grade) debt securities of issuers domiciled around the world for investment purposes and for efficient portfolio management, including hedging against risk. The Fund may invest up to 5% of its Net Asset Value in securities traded in the Russian markets. The Fund may invest in a broad range of debt securities of various types and maturities issued by commercial, governmental or supranational entities, including, for example, debentures, loan participation securities that qualify as an eligible investment by the Fund that reference bank loans or trade finance loans, loans assignments that qualify as Money Market Instruments, real estate investment trust debt securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event, preferred stock, warrants, rights, floating rate and variable rate notes, covered bonds, mortgage, commercial mortgage and other asset backed securities, collateralised debt obligations and collateralised loan obligations, coupon-bearing and deferred interest instruments (such as zero coupon bonds). The Fund may purchase or receive equity or equity-related securities in connection with a restructuring or workout of a prior or existing fixed income investment. These include common stock, inclusive of public and private equity, preferred stock or securities that may be converted into or exchanged for common stock, known as convertible securities, like rights and warrants. The Fund may also invest in debt securities of corporations issued under Rule 144A or Regulation S under the US Securities Act of 1933 (as amended).

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising bond and interest rate futures, bond, interest rate, inflation, index, and currency options, swaptions, interest rate, credit default, index credit default, currency and total return swaps; currency forwards, forward rate agreements and “to-be-announced” securities to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund will primarily invest in debt securities rated below investment grade, i.e. below Baa3 by Moody’s, BBB- by Standard & Poor’s, or BBB- by Fitch. The Fund may also invest in non-rated debt instruments deemed to be of similar credit quality by the Investment Manager. The average quality of the Fund’s holdings will tend to be in the B2/B range, but is expected to fluctuate. In case of a security with two different ratings, the lower rating shall be decisive. In case of three or more different ratings, the lower rating of the two best ratings shall be decisive.. If a security is unrated, then an equivalent credit rating, as deemed by the Investment Manager, may be used. In the event that a security is downgraded after its purchase, the Investment Manager may continue to hold such security on behalf of the Fund if it determines that it is in the best interest of the Fund. The Fund may hold equity securities, up to 5% of the Net Asset Value of the Fund, if such securities are received as a result of a corporate restructuring or as a result of owning equity-linked securities (e.g. convertible bonds, warrants).

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

There is no limit on the duration of individual Fund holdings. Duration at the Fund level is expected to be within the duration of the Index +/- 1 years although it may be outside of these limits from time to time. Duration indicates price sensitivity to fluctuations in interest rates. Duration is measured in years - the higher the duration, the more likely prices will drop as interest rates increase. For example, a bond with 5 year duration will likely decrease in value by 5% if interest rates rise 1% and increase in value by 5% if interest rates fall 1%. If the duration of the Index is 6 years, for example, the above statement means that the duration of the Fund will not be lower than 5 years, and will not be higher than 7 years.

The Fund may hold debt securities denominated in Euros or other currencies. The Investment Manager may employ currency hedging through the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, to bring the Fund’s currency exposures closer to those of the Index. The Fund is expected to have currency exposures that are similar to the Index.

The Fund will generally be diversified by country, sector and issuer and may have greater than 20% of the Net Asset Value exposure to securities issued by issuers located in what the Investment Manager considers to be emerging markets, including Russia. The Fund is expected to have a low turnover.

The Fund may also invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds**, and in exchange traded funds (“ETFs”) that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary over time, it is expected to range between 80% and 120% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

The Fund may invest in derivatives as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. Global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled Financial Derivative Instruments (FDIs).

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'debt' fund.



Note: This classification is based on the rules defined in Sec. 2(6) and Sec 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** the Euro;

**Business Day:** Every day that US Federal banks, the New York Stock Exchange, are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day, except where English banks or exchanges are expected not to be open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Duration
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subsequent Subscription (in USD or equivalent*)
S	USD 1 million	USD 1,000
T	USD 5 million	
D, N, DL	USD 5,000	
E	USD 10 million	

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own

account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class DL Shares is payable.

**Class E** Shares are available to certain investors until the total Net Asset Value of the Fund reaches USD250m or equivalent amount in another currency.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	M - Monthly Q - Quarterly
2 – Gross Distribution	M – Monthly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Charge*</b>	<b>Preliminary</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
S	N/A		0.45%	N/A
T	N/A		N/A	N/A

D	5%	0.45%	0.45%
N	N/A	0.45%	N/A
DL	3%	0.45%	1.10%
E	N/A	0.25%	N/A

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington Euro High Yield Bond Fund

**Legal entity identifier:**  
549300CPM6LQIQPQTM10

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet the following social characteristic.

The Fund will invest in issuers with an S rating and maintain an overall weighted average S Rating, in excess of the ICE Bank of America Euro High Yield Constrained Index (the "Index").

Whilst the Index is used for S Rating comparison, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

*What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?*

The difference between the Fund's weighted average S Rating and that of the Index.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

**- How have the indicators for adverse impacts on sustainability factors been taken into account?**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:**

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund’s existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards (“PAIs”) into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund will maintain an overall weighted average S Rating in excess of the Index, using a rating scale of 1-5, where 1 is the highest rating.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average S Rating in excess of the Index.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 60% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

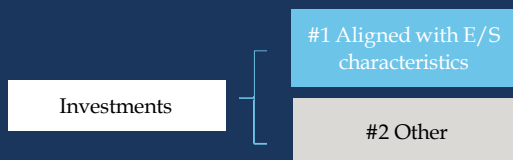
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

**How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

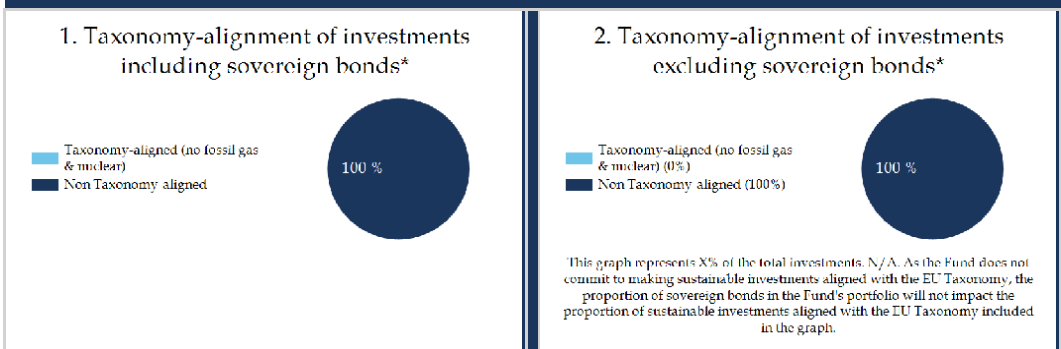
The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

**Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

- Yes
- In fossil gas       In nuclear energy

No

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not



significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.



are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of socially sustainable investments?

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



### What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?

The investments under ‘#2 Other’ may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. Whilst the Index is used for S Rating comparison, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

#### *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

Not applicable.

#### *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

#### *How does the designated index differ from a relevant broad market index?*

Not applicable.

#### *Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### Where can I find more product specific information online?

More product specific information can be found on the website:  
[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F001189\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001189)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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**WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

**Wellington Opportunistic Fixed Income Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the "Supplement") forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the "Prospectus") in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the "Company") and contains information relating to the Wellington Opportunistic Fixed Income Fund (the "Fund"), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to achieve the objective primarily via long and short (synthetic) exposure in an unconstrained manner to a broad range of fixed income debt securities across multiple geographies, including securities with both investment grade and non-investment grade credit ratings.

The Fund seeks to generate returns of 5%-7% of the Fund's Net Asset Value in USD (gross of any management, administration and distribution fees) on an annual basis, with a volatility profile in line with fixed income markets. These return and volatility targets are dependent on market conditions and are not guaranteed. The Fund's investment strategy is based on the belief that fixed income market inefficiencies exist and are most prevalent outside the core developed market sovereign and investment grade corporate sectors focused on by most investors. The Investment Manager believes that these inefficiencies can be captured through researching the investment universe without constraint and by being willing to invest where the Investment Manager's research and analysis indicates the best total return opportunities arise.

The Fund does not consider a benchmark during portfolio construction or for performance comparison purposes. However, the Bloomberg Global Aggregate Index hedged to USD (the "Index") is used as a proxy for the global market for volatility measurement. The Index is comprised of fixed income securities from a broad array of geographies and sectors with a maturity of over one year.

The objective of the Fund's investment process is to construct a benchmark-agnostic portfolio designed to maximize total return with a long-term volatility profile in line with the Index. The portfolio construction process combines the three distinct return drivers as described below:

- Strategic sector allocations: The strategic sector component of the portfolio provides exposure to non-core investment opportunities (i.e. investment opportunities outside of a core fixed income allocation to investment grade bonds, such as government and corporate bonds, emerging market debt, convertibles and securitised debt) that are designed to capture the repricing of long-term structural themes over a business cycle. These typically have a 1-5 year investment horizon, are thematic in design, and are sized based upon the Investment Manager's level of conviction, their return potential, liquidity, and their impact on the diversification of the overall portfolio.
- Market neutral approaches: These are strategies that aim to have limited sensitivity to shifts in the broader market which seek to generate returns with low correlations to broad fixed income risk factors. Market neutral strategies are typically implemented with a 1- 3 month investment horizon. Market neutral ideas include relative value approaches (which look at the relative attractiveness measured in terms of risk, liquidity, and return of one instrument relative to another) in the government bond, credit and currency markets.
- Tactical positions: Tactical investment strategies are intended to offer attractive total return prospects with low correlations to existing themes in the Fund. These positions typically have a 1 – 12 month investment horizon, Tactical ideas may be expressed as sector rotation, country

selection, currency, duration management and security selection strategies and are implemented via global government, inflation-linked, corporate, securitized, high yield, bank loan, emerging markets and convertible positions.

The three return drivers are combined and evaluated through the Investment Manager's risk management process which is used to assess the Fund's risk profile at the individual security, strategy and aggregate level. The goal of the risk management process is to ensure an overall risk profile that is consistent with the Fund's return objective and risk tolerance. The Fund's risk is evaluated by looking at its sensitivities to interest-rates, credit, currencies and macro factors (such as changes in economic output, unemployment and inflation expectations), as well as being assessed under a range of historical scenarios and stress-tests. The goal of this analysis is to ensure that the assumptions made throughout the investment process are fully stressed at the individual security, strategy and overall Fund level. The Fund aims to achieve positive risk adjusted returns as a result of its highly diversified structure and active sector rotation whilst mitigating downside losses during market downturns when many sectors may experience losses.

The Fund will apply the Company's Exclusion Policy, further details of which can be found in the section of the Prospectus entitled **Exclusions**.

The Fund may invest, either directly or indirectly through the use of FDIs, in debt securities comprising bonds issued by government, agency, quasi-sovereign, supranational, commercial and sub national government issuers as well as residential and commercial mortgage-backed securities, asset-backed securities, corporate bonds, covered bonds, corporate and real estate investment trust ("REIT") debt (which are bonds and convertible bonds issued by a REIT), both fixed and floating-rate, preferred securities, sukuk (financial instruments with cash flows similar to conventional bonds that are structured to comply with Islamic law), GDNs (global depositary notes), hybrid securities comprising convertible securities as more fully described in the section of the Prospectus entitled **Types and Description of FDIs**, contingent capital securities that may be automatically written down upon the occurrence of a specific event and contingent convertible securities that may be automatically converted into an equity security upon the occurrence of a specific event. The Fund may hold equity securities where they are a result of a corporate action, conversion or exercising a warrant. The Fund may also hold interests in limited partnerships and master limited partnerships as described in the section of the Prospectus entitled **Master Limited Partnerships**, securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)), debentures, loan participation securities (debt instruments) that qualify as an eligible investment by the Fund that reference bank loans or trade finance loans. The Fund may also invest in bank loan assignments that qualify as Money Market Instruments.

The Fund may also buy and sell index linked bonds and credit linked notes whose interest payments and/or payment at maturity depend on the performance of an underlying index or security. The underlying exposure of an index linked bond may be tied to a market index (such as a bond index or a credit default swap index) or an economic index (such as growth or inflation indices). The underlying exposure of a credit linked note is typically tied to a sovereign, quasi-sovereign or corporate bond issuer. In each case, the underlying exposure will be consistent with the Fund's investment objective and policies. The Fund also may invest in structured notes (which are synthetic securities with embedded components (such as an option, swap, forward or future)). Such structured notes may give exposure to underlying fixed income securities on a leveraged or unleveraged basis. In the event that the structured notes provide such exposure on a leveraged basis, such leverage shall be included in any global exposure calculations in accordance

with the requirements of the Central Bank.

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds that invest in the types of securities listed above and which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and may be Transferable Securities or collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, comprising currency, interest rate, bond, credit, index and inflation options, interest rate, bond, equity, credit, index and currency futures or options on futures, credit default swaps, index credit default swaps, interest rate, total return, inflation, variance, volatility and currency swaps, swaptions and swaps on an index, warrants, bond and currency forwards, forward rate agreements and “to-be-announced” securities to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes including hedging against risk. Derivatives may be used as a replacement for direct bond exposures, to hedge specific interest rate, currency or credit risk. In particular, the Fund may use a total return swap to gain long and short synthetic exposure to the total return of a basket of debt securities which constitute an eligible investment for the Fund, subject to a maximum total return swap notional value exposure of up to 20% of the Net Asset Value of the Fund. Equity derivatives may be used in markets where convertible bonds are not available, to provide a similar investment profile to convertible bonds, or to hedge fixed income securities that are highly correlated to equity markets such as corporate credit and emerging markets issues. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will typically be positive, meaning that long positions will generally be in greater proportion than synthetic short positions. Whilst the Fund’s typical net market exposure may vary in time, it is expected to range between 25% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager’s analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. Short positions may only be taken through financial derivative instruments (“FDIs”) to implement active strategies within the Fund, for hedging risk and for managing overall market exposures. The gross exposure of the Fund’s short positions is not expected to exceed 200% of the Net Asset Value of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Debt securities may be denominated in US Dollars or other currencies. The Fund may hold cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents** in multiple currencies without restriction.

The Fund will be denominated in US Dollars. Currency exposure, from the use of forward currency exchange contracts in multiple currencies, as more fully described in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**, is actively managed within the Fund and may include cross- currency positions which may or may not be influenced by the Fund’s bond and cash equivalent positions.

The Fund will generally be diversified by country, currency, sector and issuer, but may hold positions that are concentrated from time to time. The Fund may invest in emerging markets and up to 10% of its Net Asset Value in securities traded in the Russian markets. The Fund may invest in securities traded in China via Bond Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Bond Connect**). For the purposes of this Fund, an emerging market is one that the Investment Manager considers to be an emerging market.

The Fund's investments will represent a broad credit spectrum, including issues rated below investment grade and there is no minimum credit rating for individual securities or currencies. However, the Fund's weighted average credit quality, including cash and cash equivalents is generally expected to be investment grade. The Fund's Net Credit Exposure to securities rated below investment grade will not represent more than 50% of its Net Asset Value at the time of purchase. Net Credit Exposure to securitised and collateralised debt will not represent more than 50% of the Fund's Net Asset Value. Credit ratings for issues will be the highest of Moody's, S&P's, or Fitch's long term ratings. If an issue is unrated, then an equivalent credit rating, as deemed by the Investment Manager, may be used.

The Fund level effective duration will be limited to 0-10 years. There are no limits on the duration of individual holdings, and in anticipation of rising interest rates the Investment Manager may implement certain defensive interest rate hedging strategies that may result in negative duration positions at the individual security or country levels.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human right
- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
- Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of the Supplement in accordance with SFDR.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as absolute VaR to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The VaR of the Fund is calculated daily in accordance with the requirements of the Central Bank, and may not exceed 20% of the Fund's Net Asset Value for a holding period equivalent to one month. The Fund adopts a one-tailed 99% confidence level under normal market conditions for a one month holding horizon and considering at least one year of historical data. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

Where the Fund engages in securities financing transactions, a maximum of 50% of the Fund's Net Asset Value may be subject to such arrangements, with an expectation that at any time between 0% and 25% of the Fund's Net Asset Value may be subject to such arrangements

It is expected that the Fund will generally incur leverage at a rate of between 0% and 750% of its Net Asset Value through the use of FDIs. Leverage is calculated as the sum of the notional values of FDIs. The above maximum figure includes 300% for Share Class related hedging, which is comprised of 100% for the hedging itself and 200% to allow for FDIs roll overs involving positions being closed out against equal and opposite trades. This is included at a Fund level but will only concern holders of currency Hedged Share Classes. Further information on leverage can be found in the Prospectus in the section entitled **Leverage**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	25%	100%
SFTs	5%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.



## **German Taxation**

Under the German Investment Tax Act, the Fund is classified as a 'mixed' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

## **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and the New York Stock Exchange are open for business except for: Easter Monday, May 1<sup>st</sup>, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>.

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](http://wellington.com).

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time on the Dealing Day (T);

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential

investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Duration
- Emerging Markets
- Financial Derivatives Instruments
- Fixed Income and Debt Securities
- Investment in Russia
- Long-Short Strategy
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Holding Amount (in USD or equivalent*)	Minimum	Minimum Subscription (in USD or equivalent*)	Subsequent
S		USD 1 million			
T		USD 5 million		USD 1,000	
D, N, DL		USD 5,000			

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK, SEK and Brazilian Real (BRL), save as stated below. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class. BRL Share Classes are denominated in the Base Currency, which means payment of subscriptions is due in USD and payment of redemptions proceeds will be made in USD. BRL Share Classes are only available as a Hedged Share Class and are reserved exclusively for Brazilian feeder funds unless otherwise determined by the Company.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency or another named currency against the Base Currency of the Fund.

BRL Hedged Share Classes aim to provide investors with currency exposure to BRL without using a Hedged Share Class denominated in BRL (i.e. due to currency trading restrictions on BRL). The currency of a BRL Hedged Share Class will be the Base Currency. BRL currency exposure will be sought by converting the Net Asset Value of the BRL Hedged Share Class into BRL using FDI. The Net Asset Value of such BRL Hedged Share Class will remain denominated in the Base Currency (and the Net Asset Value per Share will be calculated in such Base Currency), however, due to the additional FDI exposure, such Net Asset Value is expected to fluctuate in line with the fluctuation of the exchange rate between BRL and the Base Currency. This fluctuation will be reflected in the performance of the relevant BRL Hedged Share Class, and therefore the performance of such BRL Hedged Share Class may differ significantly from the performance of the other Share Classes. Profit or loss and costs and expenses resulting from this BRL Hedged Share Class hedging strategy will be reflected in the Net Asset Value of the relevant BRL Hedged Share Class.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to Class D Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

Distribution Type	Distribution Frequency
1 – Net Distribution	M – Monthly Q – Quarterly
2 – Gross Distribution	M – Monthly
3 – Fixed Distribution	

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Preliminary Charge*	Investment Management Fee	Distribution Fee
S	N/A	0.50%	N/A
T	N/A	N/A	N/A
D	5%	0.50%	0.50%
N	N/A	0.50%	N/A
DL	3%	0.50%	1.10%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
**Wellington Opportunistic Fixed Income Fund**

**Legal entity identifier:**  
**5493007QU6WCZG2Q7C58**

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<p>It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



### What environmental and/or social characteristics are promoted by this financial product?

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

The Fund invests a portion of its assets in securities that meet the following environmental or social characteristic.

The Fund promotes certain environmental, social and governance (ESG) characteristics by investing in issuers with ESG ratings and maintain an overall weighted average ESG rating which is at least 5% better than the Bloomberg Multiverse Index (the "Index"). In order to do this, the Investment manager assigns issuers an ESG Rating, based on Wellington Management's proprietary ratings framework, using a rating scale of 1-5, where 1 is the highest rating, and is used in the overall weighted average ESG rating calculation. A rating of 1 is the most positive rating, indicating that the company or issuer is a leader among its peers in managing material E, S or G risks or incorporating ESG factors into its practices. A rating of 5 is the most negative, indicating that the company or issuer may be lagging its peers in managing certain material E, S or G risks or incorporating ESG factors into its practices.

Through the assessment of ESG ratings and the commitments as above, the Fund promotes the following characteristics by considering the following ESG factors:

- Environmental (for companies and corporates - energy efficiency, carbon emissions and pollutants, sustainable packaging and hazardous waste, and for sovereign bonds or cash equivalents - physical climate risk, climate transition risk or natural resource risk)
- Social (for companies and corporates - corruption and bribery, labour relations, product safety and supply chain management, and for sovereign bonds or cash equivalents - inequality measures, education and labour, freedom and democracy, or social factors that relate to the downward pressures supply-side dynamics can exert on a country's ability to generate economic growth over the long term)
- Governance (for companies and corporates - board diversity, executive compensation, ownership structure and shareholders' rights, and for sovereign bonds or cash equivalents - country's rule of law, degree of political stability, strength of institutions, or quality of policies)

Whilst the Index is used for ESG ratings comparison purposes, a reference benchmark has not been

designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The difference between the Fund's weighted average ESG rating and that of the Index. Since the Fund maintains a weighted average ESG rating that is at least 5% better than the Index, it is expected it to be at least 5% better than the Index.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

**Principal adverse impacts**

are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



**Does this financial product consider principal adverse impacts on sustainability factors?**

Yes

No

By virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

The Fund maintains an overall weighted average ESG rating which is at least 5% better than the Index. In order to do this, the Investment manager assigns issuers an ESG rating, using a rating scale of 1-5, where 1 is the highest rating. This is based on Wellington Management's proprietary ESG rating framework as defined in the Prospectus for corporate issuers. Sovereign bonds, and where appropriate cash equivalents such as treasury bills, will be assigned a ESG rating according to the appropriate Wellington Management's proprietary ESG framework that best represents the region of the issuer. ESG ratings aim to combine Environmental indicators (such as physical climate risk, climate transition risk or natural resource risk); Social indicators (such as inequality measures, education and labour, freedom and democracy, or social factors that relate to the downward pressures supply-side dynamics can exert on a country's ability to generate economic growth over the long term); Governance indicators (such as a country's rule of law, degree of political stability, strength of institutions, or quality of policies) into a single data point which can be used in the assessment of the environmental, social and governance activities and attributes of the sovereign issuer.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund will maintain an overall weighted average ESG rating which is at least 5% better than the Index.

### *What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

### *What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.





## What is the asset allocation planned for this financial product?

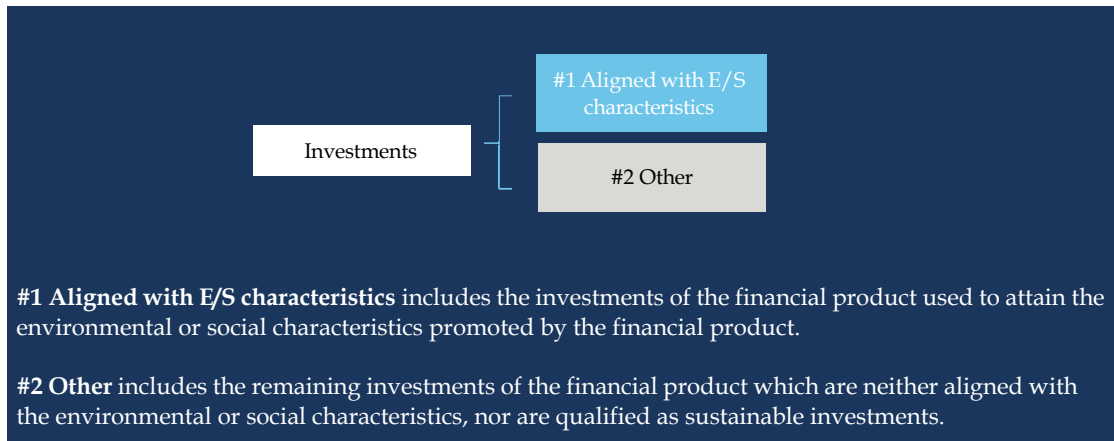
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Certain derivatives with an ESG rating are used for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund and are considered as part of the calculation of the overall weighted average ESG rating, which the Fund has committed to ensuring is which is at least 5% better than the Index.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

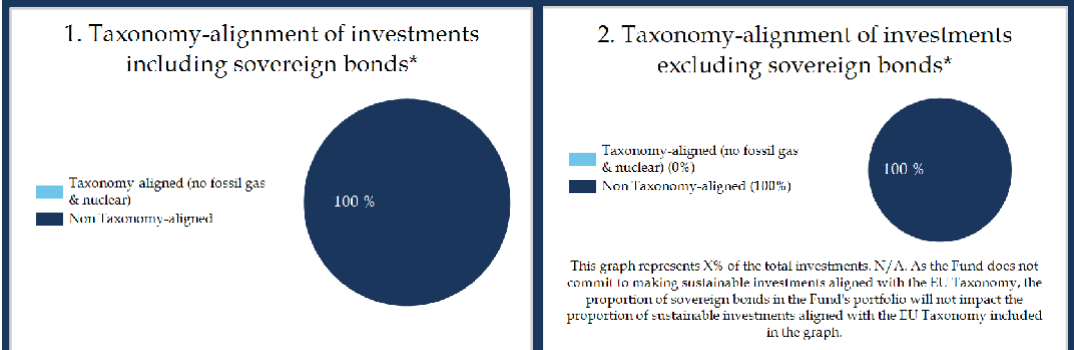
- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ' #2 Other ' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards.



Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. Whilst the Index is used for ESG ratings comparison purposes, a reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



**Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000651\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000651)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 20 March 2024**

### **Wellington Emerging Markets Opportunities Fund**

This Fund is subject to the disclosure requirements of Article 6 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Emerging Markets Opportunities Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI Emerging Markets Investable Market Index (the "Index") and achieve the objective, primarily through investment in companies that are located, and/or conduct substantial business activities, in non-developed markets, including frontier markets (as defined by MSCI). The Investment Manager will look to the location of a company's assets, revenues and earnings in determining whether a company conducts substantial business activities in non-developed markets and the location of a company's stock exchange listing will have no bearing in this evaluation.

In managing the Fund, the Investment Manager focuses primarily on bottom-up stock selection. The Investment Manager seeks to generate excess returns over the long-term, by identifying companies whose free cash flows and returns are expected to exceed market expectations. Bottom-up company analysis begins with an evaluation of where a company is in its life-cycle, then informed assumptions about its future cash returns can be made. Through this lens, investment opportunities are typically found in three areas:

- Growth Phase Companies – the market often incorrectly believes that current low returns of younger companies will continue into the future.
- "Beat the Fade" Companies – the market can underestimate the durability of above-average returns generated by high quality (quality can be associated with strong free cash flows and balance sheets) securities.
- Turnaround Companies – the market often incorrectly extrapolates continued low returns into the future and misses the point at which a company's performance turns for the better.

The sources of future returns from any company can be broken down into two primary elements: that which is earned by the company and that which is delivered by the market re-rating (the change in valuation the market is willing to pay for the company over time and changes in local currency). The Investment Manager tends to focus efforts on where expected future return may be derived from both of these sources.

The Fund will apply the Company's Exclusion Policy, further details of which can be found in the section of the Prospectus entitled **Exclusions**.

The investments underlying this Fund do not take into account the EU criteria for environmentally sustainable economic activities.

The Fund does not consider the adverse impacts of its investment decisions on Sustainability Factors.

The Fund may invest in companies across a broad spectrum of market capitalisations. Decisions on positions and their sizes within the Fund are taken independently of the composition, weighting and domicile of the components of the Index. The maximum position in an individual security is typically less than 5% of the Net Asset Value of the Fund, and the Investment Manager will seek to reduce any individual position that exceeds 7% of the Net Asset Value of the Fund.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Fund's country and sector weights are not constrained and are a by-product of the bottom-up stock selection process. Therefore, country and sector exposures may be significantly overweight or underweight relative to the Index.

The Fund will invest either directly or indirectly through financial derivative instruments ("FDIs") in equity and other securities with equity characteristics, comprising shares, preferred stocks, depository receipts (such as ADRs, GDRs and European Depository Receipts), convertible securities, investments in real estate investment trusts and market access products (including warrants on equities, options on equities and equity swaps). The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)). The Fund may invest in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**) and may invest in an unconstrained manner in securities traded on Russian markets and therefore such investments may be substantial at any given time.

The Fund may invest in exchange traded funds which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and exchanges as set out in Appendix I of the Prospectus and may be transferable securities or collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes (including to create or reduce exposures in certain countries or geographic regions) to manage cash inflows and outflows including hedging against currency or other risks. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Whilst the Fund's typical net market exposure may vary in time, it is expected to range between 50% and 150% of the Net Asset Value of the Fund, depending on the Investment Manager's analysis of the prevailing market conditions and considered in light of the investment objective of the Fund. These figures do not include derivatives relating to foreign exchange which may be used for hedging or investment purposes.

Generally, less than 5% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**, however from time to time and in certain market conditions the Fund may hold above this level.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

### **Social**

- External social factors
  - i. Social controversy

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	10%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.



Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### GENERAL INFORMATION RELATING TO THE FUND

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks, the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** **Dealing Day means a Business Day, which shall be Tuesday (or, if a Tuesday is not a Business Day, then the next Business Day immediately after the Tuesday, except when Hong Kong banks and Exchanges are expected not to be open for business;**

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time usually on the Thursday prior to the Dealing Day (T-3);

These are the typical Dealing Deadlines for the Fund. A list outlining the expected Dealing Days for a Fund throughout the year is available in the Literature section at <https://www.wellington.com/en-gb/institutional/other-literature>. This list is subject to change;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Indian Rupee Repatriation Risk
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

<b>Share Class Name</b>	<b>Maximum Preliminary Charge*</b>	<b>Investment Management Fee</b>	<b>Distribution Fee</b>
S	N/A	1.00%	N/A
T	N/A	N/A	N/A
D	5%	1.00%	1.00%

N	N/A	1.00%	N/A
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\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N and D where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington All-China Focus Equity Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington All-China Focus Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## **INVESTMENT OBJECTIVE AND POLICY OF THE FUND**

### **Investment Objective**

The investment objective of the Fund is to seek long-term total returns

### **Investment Policies**

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI China All Shares Index (the "Index") and achieve the objective, primarily through investment in companies that are located, and/or conduct substantial business activities, in China.

The Fund's investment approach is based primarily on bottom-up fundamental research into individual companies conducted by the Investment Manager. The Investment Manager aims to meet the management teams of the companies analysed multiple times, along with their competitors and suppliers, where possible when considering making an investment decision. The Investment Manager then focuses on companies that it perceives to have high quality management teams with a strong governance track record. Companies that meet the Investment Manager's standards of managerial quality (e.g. experience, governance track record, equity ownership and positive dealings with stakeholders and shareholders) are then assessed on the strength and sustainability of their business model (e.g. industry growth expectations, potential barriers to entry and relative strength of balance sheet), as well as their ability to generate sustainable long-term returns on capital. The Investment Manager has a preference for companies driven by organic growth, rather than growth by acquisition. The Investment Manager will look to the location of a company's assets, revenues and earnings in determining whether a company conducts substantial business activities in China and the location of a company's stock exchange listing will have no bearing in this evaluation. The Fund may be concentrated in a relatively small number of securities and industry sectors and will be more concentrated in terms of country exposures and, as a result, may be more volatile than more broadly diversified funds. The Fund is unconstrained by market capitalization and turnover is expected to be low.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on the Sustainability Risks listed above and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is designed to measure performance of the broader Chinese equity market. The Index does not take into account the environmental and social characteristics referenced above.

The Fund will invest in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**). In addition, the Fund will invest, directly or indirectly through the use of FDIs, in other equities and securities with equity characteristics. These may include, but are not limited to, common stocks (such as Hong Kong listed "H shares" and other international listings), depository receipts (such as ADRs, GDRs and European Depository Receipts), market access products (including warrants on equities, options on equities and equity swaps), preferred stock, dividend-right certificates, shares of closed-ended real estate investment trusts, exchange-traded funds and other collective investment schemes.

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds ("ETFs") that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, comprising the market access products mentioned above, as well as index futures and currency forwards, to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund will not normally be hedged against currency fluctuations, although the Investment Manager may employ currency hedging on an opportunistic basis when it believes it is advisable to do so.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally less than 5% of the Fund's Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**. In response to unusual

market conditions the Fund may hold up to 20% of its Net Asset Value in cash and cash equivalents for defensive purposes.

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund's market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

<b>Type of transaction</b>	<b>Expected</b>	<b>Maximum</b>
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.



Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks, the New York Stock Exchange, are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Each Business Day is a Dealing Day, except where either Hong Kong banks or exchanges or People's Republic of China ("PRC") banks or exchanges are expected not to be open for business. However, due to the use of Stock Connect, a Non-Dealing Day may occur where PRC and Hong Kong banks are closed on corresponding security settlement days.

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

#### **RISK FACTORS**

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review

this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Hedging
- Investment in China
- Market
- Reliance on the Investment Manager
- Stock Connect
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or)
S	USD 1 million	USD 1,000	
T	USD 5 million		
D, N, DL	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

#### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.95%	N/A
T	N/A		N/A	N/A
D	5%		0.95%	0.95%
N	N/A		0.95%	N/A
DL	3%		0.95%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

## Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852

**Product name:**  
Wellington All-China Focus Equity Fund

**Legal entity identifier:**  
549300WVK1H3DSJ3CE12

### Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective</b> : __% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective</b> : __%	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>



### What environmental and/or social characteristics are promoted by this financial product?

The Fund invests a portion of its assets in securities that meet one or more of the following social characteristics.

1. Issuers who receive a survey to enable the Fund to promote the adoption of appropriate policies and practices among certain investee companies with regard to modern slavery risk management, forced labour, child labour and debt bondage (“Modern Slavery”). In order to do this, the Investment Manager applies Wellington Management Group’s Emerging Markets Modern Slavery Policy (the “EM Modern Slavery Policy”). Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research and third-party research for inclusion to the Watch List (as defined below) and various levels of engagement are undertaken over a period of time until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which have exposure to such risk and which are not subject to enhanced engagement. Further details about the EM Modern Slavery Policy and Watch List may be found in the section below “What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?”.

2. Issuers that are screened for United Nations Global Compact Principles to enable the Fund to further promote appropriate policies and practices with regard to child labour and forced labour by excluding investment in companies that are assessed for and known to be involved in controversies regarding child labour or forced labour. In order to do this, the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) and 5 (businesses should uphold the effective abolition of child labour).

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

A reference benchmark has not been designated for the purpose of attaining the social characteristics

promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The percentage of the Fund's equity issuers who received a survey and have been formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management. Since at least 70% of the Fund's equity issuers are generally expected to receive a survey and be formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management, this percentage is expected to be at least 70%.

The percentage of companies held for over a year that have responded to an engagement survey regarding their modern slavery risk management policies and procedures. Since this percentage will depend on 1) the time of the investments and 2) the response to the engagement of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies deemed as having a higher risk of Modern Slavery exposure that are placed on the Watch List and are subject to enhanced engagement. Since this percentage will depend on 1) the time of the investments and 2) the result of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies where remediation measures have been adopted such that they are no longer assessed as having a higher risk of Modern Slavery exposure and may be removed from the internal Watch List. Since this percentage will depend on 1) the time of the investments and 2) the result of the remediation measures adopted following the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The number of companies held which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour). Since the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 and 5, this number is expected to be 0.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund's existing investment Guideline, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

The investment strategy used to attain the social characteristics promoted by the Fund is described below.

The Investment Manager applies Wellington Management Group's Emerging Markets Modern Slavery Policy . Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research, third-party research and engagement. At a minimum, all companies held in the Fund for a period of one year or longer will be subject to engagement regarding Modern Slavery risk management via an initial survey outreach. Due to the Fund's expected turnover, some companies may be held in the Fund for less than a year and as a result may not be engaged with regard to Modern Slavery risk management.

Additionally, the Investment Manager excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.



*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

Investee companies engaged with will be reviewed based on the Investment Manager's research into the policies and operations of such companies and in accordance with the EM Modern Slavery Policy. This review will assess the Modern Slavery risk profile of each actively held company and the measures each actively held company has put in place to manage exposure to the risk of Modern Slavery on a peer relative basis. This assessment may be made on a number of factors including, but not limited to, industry and country Modern Slavery risk assessment, the adequacy of policies and procedures in place to mitigate Modern Slavery exposure risk, the profile of and visibility into the investee supply chain, and the extent to which the investee company is transparent with regard to its policies and operations and the market capitalization of the company. Upon the Investment Manager's review, investee companies which are deemed by the Investment Manager as having a higher risk of Modern Slavery exposure, and which in the Investment Manager's opinion do not have adequate policies and procedures in place to manage Modern Slavery risk will be placed on an internal watch list (the "Watch List") and subject to enhanced engagement. Companies identified for enhanced engagement will be subject to higher scrutiny while actively held in the Fund for a cumulative period of up to 5 years from the point of initial inclusion on the Watch List. Where the Investment Manager divests from a company, that company may no longer be subject to enhanced engagement. If the Investment Manager reinvests in such company, the 5-year cumulative period will commence again based on where it was before the company was sold. The Investment Manager expects to engage with 100% of investee companies included on the active Watch List over a period of up to 5 years.

During that five-year cumulative enhanced engagement period, the Investment Manager will encourage Watch List companies to implement appropriate policies and practices with regard to Modern Slavery risk management. Tools for enhanced engagement may include, but are not limited to, one-on-one meetings with management and/or members of the board, shareholder proposals and exercising voting rights. The use of these tools will be governed in concert with Wellington Management's Engagement Policy.

During the five-year cumulative enhanced engagement period, the Investment Manager is able to increase the Fund's holding in a Watch List company or purchase a Watch List company. Watch List companies which fail to demonstrate adequate progress on Modern Slavery risk management after a period of five years of enhanced engagement will be excluded from the Fund's investible universe (and if held disinvested by the Fund) until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which may have exposure to such risk and which are not subject to enhanced engagement.

The Fund also excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance**  
practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

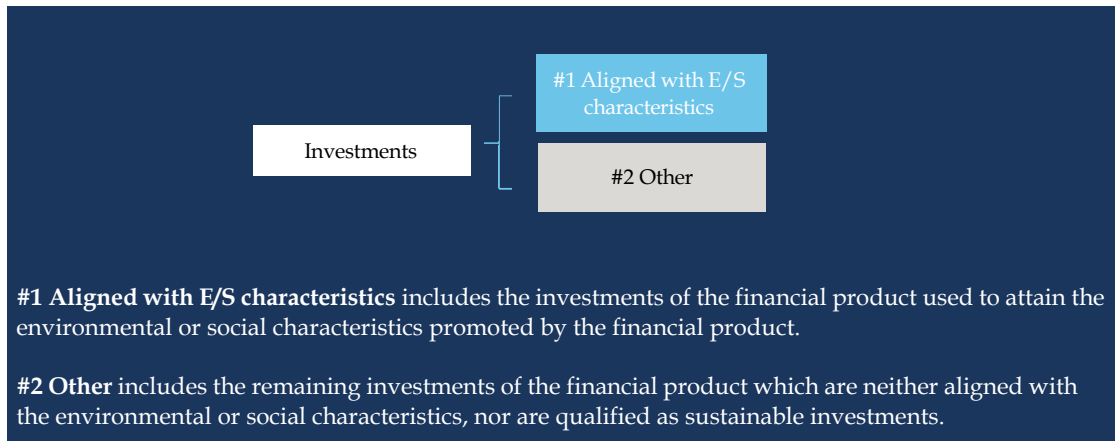
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to fund investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

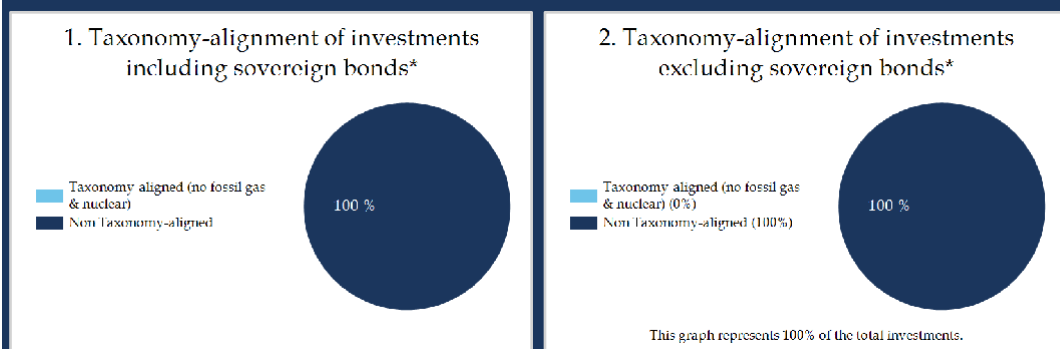
- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ' #2 Other ' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?  
query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in  
\(fundId,F001194\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001194)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington India Focus Equity Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus”) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington India Focus Equity Fund (the “Fund”), a separate sub-fund of the Company.**

Shares of the Wellington India Focus Equity Fund may not be offered or sold, directly or indirectly, to persons who are non-resident Indians, overseas citizens of India or resident Indians, unless otherwise determined by the Directors.

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI India Index (the "Index") and achieve the objective by investing primarily in equity and equity related securities of companies that are incorporated or operating in India.

The Fund's investment approach is based primarily on proprietary bottom-up fundamental research conducted by the Investment Manager. The Investment Manager focuses on companies that are perceived to be undervalued high-quality companies and identifying businesses that will be recognized as a high quality in the future. The Investment Manager defines a high-quality company as a business that is able to sustain higher return on capital owing to competitive advantage versus peers (such as a successful or difficult to replicate business model, demonstrated strong management capability, a leading brand, industry level barriers to entry, strong corporate governance, or a combination of these factors). The Investment Manager utilizes what it calls "ecosystem" analysis which includes meeting the management teams of companies multiple times, along with their competitors, suppliers, customers, regulators and relevant government officials, where possible, when considering making an investment decision. The Investment Manager believes that a high-quality business model generates sustainable long-term returns on equity leading to share price outperformance over time. The Fund may be concentrated in a relatively small number of securities, industry sectors and/or countries and as a result, may be more volatile than more broadly diversified funds.

### Sustainability Risk Consideration

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### Environmental

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)

#### Social

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### Governance

- Corporate management practices
  - i. Inadequate external or internal audit

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled Risk Factors.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. The Index is designed to measure performance of the Indian equity market. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index does not take into account the environmental and social characteristics referenced above.

The Fund may invest, either directly or indirectly through Financial Derivative Instruments (“FDIs”), in equity and other securities with equity characteristics, comprising shares, preferred stock, warrants and rights, convertible securities and investments in real estate investment trusts, depository receipts (such as ADRs, GDRs and European Depository Receipts), and market access products (comprising warrants on equities, options on equities and equity swaps). The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in exchange traded funds that invest in the types of securities listed above and which constitute an eligible investment for the Fund. These will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and may be transferable securities or collective investment schemes. Typically no more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs comprising the market access products mentioned above, as well as index futures and currency forwards to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The Fund will not normally be hedged against currency fluctuations, although the Investment Manager may employ currency hedging on an opportunistic basis when it believes it is advisable to do so, in particular it may employ currency hedging to manage currency risk associated with the repatriation of local currency from India.

The indices to which the Fund may gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

Generally, less than 10% of the Fund’s Net Asset Value will be invested in cash and cash equivalents as described in the section of the Prospectus entitled **Cash and Cash Equivalents**.

### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund’s market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk



management method can be found in the Prospectus in the section entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund's Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

#### **Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	5%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

#### **German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

#### **GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks and, the New York Stock Exchange, are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock

Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day, except where either India banks or exchanges or Singapore banks or exchanges are expected not to be open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on wellington.com

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within four Business Days, but not more than ten Business Days, from the Dealing Deadline in respect of a redemption request;

**Initial Offer Period:** The Initial Offer Period for the Quarterly Distributing Shares will commence on 23 April 2024 and close on 22 October 2024.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Concentration
- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Indian Rupee Repatriation Risk

- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

### Substantial Investment in India

The Fund invests substantially in the Indian market and redemptions from the Fund will be subject to Indian Rupee Repatriation Risk. In particular, large redemptions, such as those exceeding 5% of the Net Asset Value of the Fund, may enhance the impact of this risk on the Fund. Shareholders should be aware of the below potential impacts of local Indian market rules and conditions on the repatriation of currency required to meet redemptions, in particular:

- For a redeeming Shareholder, the Fund's repatriation of currency from India may be subject to delays which are outside of the Fund's control. This may result in delays in the payment of redemption proceeds beyond the Fund's standard settlement terms, subject to the requirements of the Regulations.
- For remaining Shareholders, the Fund's repatriation of currency from India will expose the Fund to currency risk which may result in losses to the Fund. Where possible, the Fund may mitigate this risk (for example, via currency hedging), however there is no guarantee that this will be successful.

### DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Share Classes	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent USD or
S	USD 1 million	USD 1,000	
T	USD 5 million		
E	USD 10 million		
D, N, GD and DL	USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

**Class E** Shares are available for certain investors until the total Net Asset Value of the Fund reaches USD 100m or an equivalent amount in another currency or subject to the discretion of the Company.

**Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class DL Shares is payable.

**Class GD** Shares are reserved for existing Shareholders whose previous Shares have been changed, and serve as “grandfathered” Classes, enabling the Shareholders to remain invested without undergoing those changes. The GD Classes in the Fund are only available to those investors that were holding Shares in the Fund as at 13 July 2020. A distribution fee attributable to the Class GD Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

#### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q - Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

## FEES AND EXPENSES

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Charge*	Preliminary	Investment Management Fee	Distribution Fee
S	N/A		0.80%	N/A
T	N/A		N/A	N/A
D	5%		0.80%	0.75%
N	N/A		0.80%	N/A
DL	3%		0.80%	1.65%
E	N/A		0.25%	N/A
GD	5%		0.80%	0.80%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D, DL and GD where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington India Focus Equity Fund**

**Legal entity identifier:**  
**5493001UKPK6ZGV48G80**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> Yes	<input type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: __%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: __%</b>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of __% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input checked="" type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet one or more of the following social characteristics.

1. Issuers who receive a survey to enable the Fund to promote the adoption of appropriate policies and practices among certain investee companies with regard to modern slavery risk management, forced labour, child labour and debt bondage (“Modern Slavery”). In order to do this, the Investment Manager applies Wellington Management Group’s Emerging Markets Modern Slavery Policy (the “EM Modern Slavery Policy”). Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research and third-party research for inclusion to the Watch List (as defined below) and various levels of engagement are undertaken over a period of time until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which have exposure to such risk and which are not subject to enhanced engagement. Further details about the EM Modern Slavery Policy and Watch List may be found in the section below “What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?”.

2. Issuers that are screened for United Nations Global Compact Principles to enable the Fund to further promote appropriate policies and practices with regard to child labour and forced labour by excluding investment in companies that are assessed for and known to be involved in controversies regarding child labour or forced labour. In order to do this, the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) and 5 (businesses should uphold the effective abolition of child labour).

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

A reference benchmark has not been designated for the purpose of attaining the social characteristics

promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The percentage of the Fund's equity issuers who received a survey and have been formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management. Since at least 70% of the Fund's equity issuers are generally expected to receive a survey and be formally evaluated for inclusion to the Watch List regarding Modern Slavery risk management, this percentage is expected to be at least 70%.

The percentage of companies held for over a year that have responded to an engagement survey regarding their modern slavery risk management policies and procedures. Since this percentage will depend on 1) the time of the investments and 2) the response to the engagement of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies deemed as having a higher risk of Modern Slavery exposure that are placed on the Watch List and are subject to enhanced engagement. Since this percentage will depend on 1) the time of the investments and 2) the result of the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The percentage of companies where remediation measures have been adopted such that they are no longer assessed as having a higher risk of Modern Slavery exposure and may be removed from the internal Watch List. Since this percentage will depend on 1) the time of the investments and 2) the result of the remediation measures adopted following the survey, this percentage cannot be disclosed in the Fund's pre-contractual template but will be disclosed in the Fund's periodic reporting.

The number of companies held which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour). Since the Fund excludes investments in companies which are assessed to have failed United Nations Global Compact Principles 4 and 5, this number is expected to be 0.

***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Not applicable. The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR.

The EU Taxonomy sets out a "do not significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The "do no significant harm" principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.





## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

By virtue of the Fund's existing investment Guideline, the Fund takes certain, but not all, of the Principal Adverse Impacts listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs") into consideration either directly or indirectly on all or a portion of the Fund:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate the Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

The investment strategy used to attain the social characteristics promoted by the Fund is described below.

The Investment Manager applies Wellington Management Group's Emerging Markets Modern Slavery Policy . Under the EM Modern Slavery Policy investee companies are evaluated by the Investment Manager on the basis of proprietary research, third-party research and engagement. At a minimum, all companies held in the Fund for a period of one year or longer will be subject to engagement regarding Modern Slavery risk management via an initial survey outreach. Due to the Fund's expected turnover, some companies may be held in the Fund for less than a year and as a result may not be engaged with regard to Modern Slavery risk management.

Additionally, the Investment Manager excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

The Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

*What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

Investee companies engaged with will be reviewed based on the Investment Manager's research into the policies and operations of such companies and in accordance with the EM Modern Slavery Policy. This review will assess the Modern Slavery risk profile of each actively held company and the measures each actively held company has put in place to manage exposure to the risk of Modern Slavery on a peer relative basis. This assessment may be made on a number of factors including, but not limited to, industry and country Modern Slavery risk assessment, the adequacy of policies and procedures in place to mitigate Modern Slavery exposure risk, the profile of and visibility into the investee supply chain, and the extent to which the investee company is transparent with regard to its policies and operations and the market capitalization of the company. Upon the Investment Manager's review, investee companies which are deemed by the Investment Manager as having a higher risk of Modern Slavery exposure, and which in the Investment Manager's opinion do not have adequate policies and procedures in place to manage Modern Slavery risk will be placed on an internal watch list (the "Watch List") and subject to enhanced engagement. Companies identified for enhanced engagement will be subject to higher scrutiny while actively held in the Fund for a cumulative period of up to 5 years from the point of initial inclusion on the Watch List. Where the Investment Manager divests from a company, that company may no longer be subject to enhanced engagement. If the Investment Manager reinvests in such company, the 5-year cumulative period will commence again based on where it was before the company was sold. The Investment Manager expects to engage with 100% of investee companies included on the active Watch List over a period of up to 5 years.

During that five-year cumulative enhanced engagement period, the Investment Manager will encourage Watch List companies to implement appropriate policies and practices with regard to Modern Slavery risk management. Tools for enhanced engagement may include, but are not limited to, one-on-one meetings with management and/or members of the board, shareholder proposals and exercising voting rights. The use of these tools will be governed in concert with Wellington Management's Engagement Policy.

During the five-year cumulative enhanced engagement period, the Investment Manager is able to increase the Fund's holding in a Watch List company or purchase a Watch List company. Watch List companies which fail to demonstrate adequate progress on Modern Slavery risk management after a period of five years of enhanced engagement will be excluded from the Fund's investible universe (and if held disinvested by the Fund) until adequate remediation measures are adopted.

The EM Modern Slavery Policy does not aim to eliminate Modern Slavery risk exposure in all investee companies and the Fund may from time to time invest in companies which may have exposure to such risk and which are not subject to enhanced engagement.

The Fund also excludes companies which have been assessed to be in violation of United Nations Global Compact principles 4 (businesses should uphold the elimination of all forms of forced and compulsory labour) or 5 (businesses should uphold the effective abolition of child labour) due to known controversies regarding child labour or forced labour.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



## What is the asset allocation planned for this financial product?

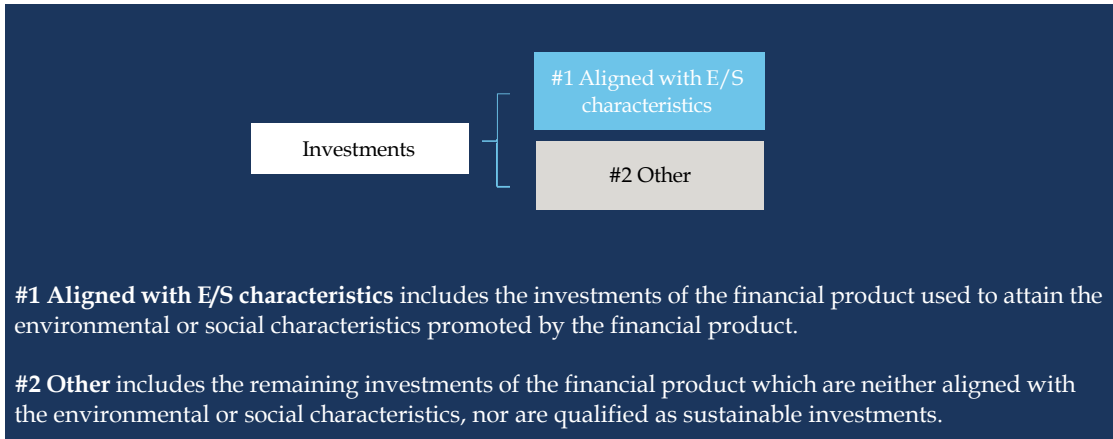
**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 70% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

### *How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



### *To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of EU Taxonomy-aligned investments is 0%.

### *Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas       In nuclear energy
- No

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

**What is the minimum share of investments in transitional and enabling activities?**

The Fund does not currently commit to invest in any Sustainable Investments within the meaning of the SFDR, accordingly the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What is the minimum share of socially sustainable investments?**

Not applicable. The Fund does not commit to make any Sustainable Investments within the meaning of the SFDR.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

The investments under ' #2 Other ' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.

**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

**How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?**

Not applicable.

**How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?  
query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in  
\(fundId,F001207\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F001207)%26languageCd=EN&recentMatch=true&download=true)

The Directors of the Company, whose names appear in the **Management and Administration** section of the Prospectus, accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure such is the case), 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.

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## **WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC**

(an umbrella type open-ended investment company with variable capital and segregated liability between Funds, incorporated with limited liability under the laws of Ireland with registered number 267944)

**Dated 22 April 2024**

### **Wellington Emerging Market Development Fund**

The Fund is subject to the disclosure requirements of Article 8 of the SFDR

**This document (the “Supplement”) forms part of, and should be read in the context of, and together with, the prospectus dated 20 March 2024 as may be amended from time to time (the “Prospectus) in relation to WELLINGTON MANAGEMENT FUNDS (IRELAND) PLC (the “Company”) and contains information relating to the Wellington Emerging Market Development Fund (the “Fund”), a separate sub-fund of the Company.**

Prospective investors should review this Supplement and the Prospectus carefully and in their entirety and consider the risk factors set out in the Prospectus and in this Supplement before investing in the Fund. If you are in any doubt about the contents of this Supplement, you should consult your stockbroker, bank manager, solicitor, accountant and/or financial adviser.

Words and expressions defined in the Prospectus will, unless otherwise defined in this Supplement, have the same meaning when used in this Supplement.

## INVESTMENT OBJECTIVE AND POLICY OF THE FUND

### Investment Objective

The investment objective of the Fund is to seek long-term total returns.

### Investment Policies

The Investment Manager will actively manage the Fund, seeking to outperform the MSCI Emerging Market Index (the “Index”), primarily through investing in companies domiciled or listed in emerging markets, and to a lesser extent, in developed and frontier (as defined by MSCI) market countries and to achieve the objective by investing in companies which are positioned to benefit from themes relating to the structural and economic development of emerging markets.

Investments in developed markets will be focused on companies which conduct substantial business in emerging markets as determined by the Investment Manager, including (i) companies that have substantial assets in emerging markets; (ii) companies the Investment Manager believes will experience significant growth from business activities conducted in emerging markets; and (iii) companies that derive a substantial portion of their total revenues from either goods and services produced in, or sales made in, emerging markets.

The Investment Manager believes that economic development in emerging market countries has emerged as both a policy priority for governments and an investment opportunity. In its view, such emergence has been underappreciated and is creating three structural changes within emerging market economies over time:

- Economic Progress: Increasing innovation and the efficiency of all available factors of production.
- Sustainability: Using available resources with due consideration for future generations and the environment.
- Social Evolution: Improving living standards and broadening the range of beneficiaries of economic development.

These structural changes within emerging market economies may evolve in the long-term as market opportunities change (e.g. policy changes, changes in demographics).

The Investment Manager seeks to identify long-term themes which reflect the above structural changes (for example sustainability may be supported by energy efficiency or social evolution via health care provision), and that align with UN Sustainable Development Goals (“SDG”) with all companies in each theme falling within this definition based on the Investment Manager’s proprietary internal investment framework. Theme selection will be based on a range of quantitative (such as risk/reward potential, theme liquidity) and qualitative (such as structural tailwinds due to government policy focus) considerations of the Investment Manager as well as the accessibility of the investments. The Investment Manager will invest on an unconstrained basis (meaning that portfolio positioning may deviate meaningfully from the Index). Allocations to each theme will evolve over time and are determined based on the risk profile of each theme, the relationship of each theme to others in the portfolio and the relative conviction the Investment Manager has across the themes over time.

The Investment Manager will aim to invest in companies best positioned to take advantage of structural and economic shifts or development trends within emerging economies, which means that country and sector weights are a residual of theme selection and active security selection and may be meaningfully different from the Index. The Fund may hold concentrated positions within a theme but will generally be well diversified. The Fund seeks to build exposures to longer term structural themes, and as such,



the Investment Manager expects to both have a lower sensitivity to the growth cycle and differ from, but complement, traditional approaches that are linked to an index. The Fund may be appropriate for investors who are seeking an alternative to traditional emerging market exposures. The Fund is not restricted by market capitalisation but is expected to have a bias towards small- and mid-cap companies.

### **Sustainability Risk Consideration**

The Sustainability Risks that are most frequently relevant to the investment process of this Fund include:

#### **Environmental**

- Transition risks from climate change
  - i. Implied temperature risk (ITR)
  - ii. Greenhouse gas emissions (WACI)
- Scarcity of natural resources & biodiversity
- Pollution & waste

#### **Social**

- Internal social factors
  - i. Child & forced labour
  - ii. Human rights
- External social factors
  - i. Social controversy

#### **Governance**

- Lack of diversity at board or governing body level
- Corporate management practices
  - i. Inadequate external or internal audit
- The absence of appropriate and effective safeguards for employment related risks
  - i. Workplace accident prevention policy

Further details on Sustainability Risks and their potential impacts are included under **Sustainability Risks** within the section of the Prospectus entitled **Risk Factors**.

Pre-contractual disclosure information relating to the ESG characteristics, or objectives, of the Fund is provided at the end of this Supplement in accordance with the SFDR.

The Index serves as a reference benchmark for performance comparison purposes. Whilst Fund securities may be components of the Index, the Index is not considered during portfolio construction and the Investment Manager will not manage the extent to which Fund securities differ from the Index. The Index is designed to measure large- and mid-cap equity market performance across global emerging markets.

The Fund will primarily invest, directly or through FDIs, in equity and other securities with equity characteristics, comprising shares, preferred stock, investments in real estate investment trusts, convertible securities, warrants, depository receipts (such as ADRs, GDRs and European Depository Receipts) and market access products (comprising warrants on equities, options on equities and equity swaps). The Fund may also hold securities issued pursuant to Rule 144A and/or Regulation S securities (Regulation S securities are those offered outside the United States without registration under the United States Securities Act of 1933 (as amended)).

The Fund may invest in collective investment schemes as described in the section of the Prospectus entitled **Investment in Other Investment Funds** and in exchange traded funds (“ETFs”) that provide exposure to the types of securities listed above and which constitute an eligible investment for the Fund. Such ETFs will be listed and/or traded on the markets and/or exchanges as set out in Appendix I of the Prospectus and regulated as UCITS or as AIF ETFs. No more than 5% of the Net Asset Value of the Fund will be invested in non-listed and non-traded collective investment schemes.

The Fund may buy and sell exchange-traded and over-the-counter FDIs, both long and short, comprising the market access products mentioned above, as well as swaps on indices, currency forwards and index futures to gain exposure to the instruments listed above in pursuit of the investment objective and for efficient portfolio management purposes, including hedging against risk. Full details of the types of FDIs and the ways in which the Fund may utilise them are further detailed in the section of the Prospectus entitled **Types and Description of FDIs**.

The indices to which the Fund will gain exposure will be eligible indices according to the Central Bank requirements and will comprise indices of which the constituents include the types of securities described above, in which the Fund may directly invest.

The net market exposure (sum of long and synthetic short positions including cash) of the Fund will always be positive, meaning that long positions will be in greater proportion than any synthetic short positions. Depending on the Investment Manager’s analysis of the prevailing market conditions, the Fund’s typical net market exposure may vary in time, however it will not exceed 100% of the Net Asset Value of the Fund for investment reasons. These figures do not include the use of derivatives for foreign exchange which are generally limited to hedging.

The Fund may invest in developed countries and any country which is considered by the Investment Manager to be an emerging market or a frontier market. These are primarily located in Latin/Central America and the Caribbean, Central and Eastern Europe, Middle East, Africa and Asia. The Fund may invest up to a maximum of 20% of its Net Asset Value in securities traded on Russian markets from time to time and may invest in China A Shares traded via Stock Connect (see also section of the Prospectus entitled **Risks linked with dealing in securities in China via Stock Connect**).

#### **Global Exposure and Leverage**

The Investment Manager uses a risk management technique known as the commitment methodology to assess the Fund’s market risk to seek to ensure that its use of FDIs is within regulatory limits. The global exposure generated through the use of financial derivative instruments is limited to 100% of the Net Asset Value of the Fund when calculated using the commitment methodology. Further information on the risk management method can be found in the Prospectus in the section of the Prospectus entitled **Financial Derivative Instruments (FDIs)**.

#### **Borrowing and Lending Powers**

The Fund may borrow up to 10% of the Fund’s Net Asset Value at any time for the account of the Fund and may charge the assets of the Fund as security for any such borrowing, provided that such borrowing is only for temporary purposes such as securities settlement or meeting a redemption, and not for leverage. Without prejudice to the powers of the Fund to invest in Transferable Securities, the Fund may not lend to, or act as guarantor on behalf of, third parties. The Fund may acquire debt securities and securities which are not fully paid.

#### **Profile of a typical Investor**

The Fund is suitable for retail investors seeking long-term total returns. Investors in the Fund should be prepared to accept, in normal market conditions, a high degree of volatility of Net Asset Value from time to time. The Fund is suitable as an investment in a well-diversified portfolio.

**An investment in the Fund should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors.**

**Exposure to Securities Financing Transactions ("SFTs")**

The Fund's expected and maximum exposure to SFTs is as set out below (in each case as a percentage of net asset value):

Type of transaction	Expected	Maximum
Total return swaps	0%	20%
SFTs	1%	60%

Further information on SFTs can be found in the Prospectus in the section entitled **Securities Financing Transactions Regulation**.

**German Taxation**

Under the German Investment Tax Act, the Fund is classified as an 'equity' fund.

Note: This classification is based on the rules defined in Sec. 2(6) and Sec. 2(7) of the German Investment Tax Act, as of the date of this Supplement. Please refer to WM Datenservice for the current physical equity participation rate of the Fund, which is updated daily.

Further information on German Taxation can be found in the Prospectus in the section entitled **German Taxation**.

**GENERAL INFORMATION RELATING TO THE FUND**

**Base Currency:** US Dollars (USD);

**Business Day:** Every day that US Federal banks, the New York Stock Exchange are open for business except for: Easter Monday, May 1st, the weekday prior to and following Christmas Day as observed by the New York Stock Exchange as well as any such other days as the Directors may from time to time determine;

**Dealing / Non-Dealing Day:** Dealing Day means a Business Day, except where Singapore banks or exchanges are expected not to be open for business;

A list outlining the expected Non-Dealing Days for the Fund throughout the year is available in the Investor Notices and Policies section at <https://www.wellington.com>

In the event that an unexpected Non-Dealing Day is called for the Fund, this list will be updated as soon as reasonably practicable on an ad-hoc basis and specific communications will be made in advance, where possible, to affected Shareholders on [wellington.com](https://www.wellington.com)

**Dealing Deadline:** The deadline for subscription, conversion and redemption orders to be received by the Transfer Agent is 2:00 pm Ireland time one day prior to the Dealing Day (T-1), provided that day is also a Dealing Day. Where this is not a Dealing Day, the Dealing Deadline will default to the prior Dealing Day;

**Settlement Date:** For payment of Shares subscribed for, means no later than 4:00 p.m. New York time on the second Business Day following the Dealing Day on which the Shares were purchased. For payment of redemption proceeds, Settlement Date means a date usually within two Business Days, but not more than ten Business Days, from the trade date in respect of a redemption request.

## RISK FACTORS

Potential investors' attention is drawn the section headed **Risk Factors** in the Prospectus which potential investors should consider before investing in the Fund. Set out below are the principal risks associated with an investment in the Fund. This list is not intended to be exhaustive and potential investors should review this Supplement and the Prospectus in their entirety and consult with their professional advisers, before making an application for Shares. There can be no assurance that the Fund will achieve its objective. The principal risks, which are described in the **Risk Factors** section of the Prospectus, are as follows:

- Counterparty
- Currency
- Emerging Markets
- Equity
- Financial Derivatives Instruments
- Indian Rupee Repatriation Risk
- Investment in Russia
- Liquidity
- Market
- Operational Risk
- Reliance on the Investment Manager
- Sustainability Risks

## DEALING IN SHARES

For a guide on how to invest in the Fund potential investors should refer to the **Dealing in Shares** section of the Prospectus and also to the Investor Guide which is available at [www.wellington.com](http://www.wellington.com) and from the Transfer Agent.

Available Classes	Share	Minimum Initial Subscription/ Minimum Holding Amount (in USD or equivalent*)	Minimum Subscription (in USD or equivalent*)	Subsequent (in USD or equivalent*)
S		USD 1 million	USD 1,000	
T		USD 5 million		
D, N, DL		USD 5,000		

\*Each Share Class is available in the following currencies: USD, EUR, GBP, CHF, JPY, AUD, NZD, SGD, CAD, HKD, NOK and SEK. Each Share Class in each Dealing Currency is available as both a

Distributing Share Class and an Accumulating Share Class. Each Share Class in each Dealing Currency other than the Base Currency is available as both a Hedged Share Class and an unhedged Share Class.

Hedged Share Classes will be created in accordance with the Central Bank's UCITS Regulations and interpretations promulgated by the Central Bank from time to time and involve hedging the Dealing Currency against the Base Currency of the Fund.

**Class S** Shares are available only for Institutional Investors.

**Class T** Shares are reserved for investors that have a direct investment advisory or other relationship with the Investment Manager or an affiliate, and for investment by the Investment Manager and/or its affiliates (including affiliated pension plans).

**Class D** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable. **Class N** Shares are reserved for investors acting as financial intermediaries on behalf of underlying beneficial holders who either, according to applicable regulatory requirements, are not allowed to accept and retain a distribution fee or who have separate fee arrangements with their clients which preclude them from accepting and retaining a distribution fee, and for Institutional Investors investing on their own account, who do not meet the criteria for Class S Shares. No distribution fee is paid in respect of the Class N Shares.

**Class DL** Shares are reserved for investors in certain markets, acting as financial intermediaries on behalf of underlying beneficial holders and in respect of whom a distribution fee attributable to the Class D Shares is payable.

The Initial Issue Price for each Share Class is 10 of the relevant Dealing Currency of that Share Class save for NOK Share Class and SEK Share Class where the Initial Issue Price is NOK 100 and SEK 100 respectively and JPY Share Classes where the Initial Issue Price is JPY 10,000. Prior to 7 September 2018 SEK and NOK Share Classes launched at an Initial Issue Price of SEK 10 and NOK 10 respectively.

For further information on the characteristics of each Share Class please consult the **Dealing in Shares** section of the Prospectus.

All Share Classes in the Fund are subject to swing pricing, for further information on swing pricing potential investors should refer to the **Swing Pricing Procedure** section of the Prospectus.

### **Distribution Payments**

The Fund offers Distributing Share Classes as set out in the table below.

<b>Distribution Type</b>	<b>Distribution Frequency</b>
1 – Net Distribution	A – Annually Q – Quarterly

Shareholders can elect to reinvest the distribution proceeds into additional Shares of the same class or will receive distribution payments in cash by way of wire transfer or otherwise in accordance with the terms of the Account Opening Agreement and the Investor Guide.

For further information please consult the **Distribution Policy** section of the Prospectus.

### **FEES AND EXPENSES**

The Investment Management Fee and Distribution Fee are each accrued daily in the Net Asset Value of the relevant Classes of Shares at the annual rate set out in the table below.

The Investment Management Fee is paid monthly in arrears whilst the Distribution Fee is paid quarterly in arrears.

Share Class Name	Maximum Preliminary Charge*	Investment Management Fee	Distribution Fee
S	N/A	0.80%	N/A
T	N/A	N/A	N/A
D	5%	0.80%	0.80%
N	N/A	0.80%	N/A
DL	3%	0.80%	1.65%

\*Payable to financial adviser or intermediary

Each Share Class of the Fund is also subject to an administrative fee which will vary across Classes of Shares, reflecting the differing expenses of such Classes of Shares, but the maximum administrative fee that is paid shall not exceed 0.25% per annum for all Classes of Shares with the exception of Classes N, D and DL where the maximum administrative fee that is paid shall not exceed 0.40% per annum.

For further details on fees and expenses potential investors should refer to the **Charges and Expenses** section of the Prospectus.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Product name:**  
**Wellington Emerging Market Development Fund**

**Legal entity identifier:**  
**5493004E3LPOWFC4YP37**

**Environmental and/or social characteristics**

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> Yes	<input type="radio"/> <input checked="" type="radio"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: __%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: __%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 75% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, <b>but will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What environmental and/or social characteristics are promoted by this financial product?**

The Fund invests a portion of its assets in securities that meet one or more of the following environmental or social characteristics.

1. Companies that are considered Sustainable Investments. The Fund invests in companies the Investment Manager believes are positioned to benefit from themes relating to the structural and economic development of emerging markets. In line with the Fund’s thematic approach, the Investment Manager will seek to promote sustainable economic development by investing at least 75% of the Fund’s net assets in companies that are considered Sustainable Investments.

2. Companies that are screened to enable the Fund to exclude companies identified as involved in the mining of thermal coal. The Fund also considers any revenue generated from thermal coal, excluding any company that generates a certain percentage of its revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).

A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

The number of companies held that are involved in the mining of thermal coal. The number of companies that generate more than 25% of their revenue from thermal coal energy generation identified using a combination of third party and/or internal Wellington Management analysis.

The percentage of the Fund’s net assets invested in companies that are considered Sustainable Investments.

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

*What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?*

The Fund invests in companies that the Investment Manager believes contribute to sustainable economic development in emerging markets.

The Investment Manager will identify investment opportunities which both align with the UN Sustainable Development Goals ("UN SDGs") and reflect the following long-term themes:

- Innovation – Increasing innovation and the efficiency of all available factors of production in areas such as advances in use of technology, promotion of innovation, institutional reform.
- Sustainability – Using available resources with due consideration for future generations and the environment in areas such providing better access to recycling, waste management, energy efficiency, alternative energy sources, testing and diagnostics.
- Inclusion – Improving living standards and broadening the range of beneficiaries of economic development in areas such as improving access to health care, education and finance.

Alignment with these sustainable goals is determined in the theme universe construction process. Only companies which meet our threshold for theme purity – where a minimum of 50% of the revenue is aligned with the theme's objective (or the Investment Manager projects that the total revenue that aligns with the theme will grow to at least a minimum of 50% in the near future) – are included in the investible universe for that theme.

*How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?*

Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign Principal Adverse Impacts, as appropriate for the asset type, and as listed in Annex I Table I of the Level II SFDR Regulatory Technical Standards ("PAIs").

PAIs are assessed quantitatively, according to third party data, or qualitatively by the Investment Manager's research analysts and investment teams using internal research and analysis regarding issuer activities.

Where PAI data is lacking or unavailable, and as applicable to the asset type, the Investment Manager will conduct further due diligence and qualitatively assess the issuer's activities, processes or policies related to climate, environmental, social and/or anti-bribery/anti-corruption matters to determine that the issuer is not doing significant harm.

**PAI Criteria**

Where the PAIs reflect a quantitative data point and such quantitative data is available, each Sustainable Investment is compared against quantitative thresholds set by the Investment Manager as applicable to the asset type. The thresholds may be determined by setting express conditions or fixed numerical thresholds for a given PAI. For example, companies which produce controversial weapons are excluded in accordance with the Exclusions Policy, while the greenhouse gas emissions PAI threshold is applied to issuers included within the Climate Action 100+ list as the largest corporate greenhouse gas emitters. The Climate Action 100+ list is comprised of corporate issuers representing approximately 80% of global corporate GHG emissions. Companies on the Climate Action 100+ list which have reported against TCFD standards and have stated interim and long-term decarbonization / net zero goals are not deemed to be doing significant harm.

Certain PAIs are evaluated relative to industry peers and the worst companies in those industries will set the standard for determining significant harm. Where the Investment Manager has determined that industry differentiation is less meaningful, thresholds will be set in the context of all issuers. As an example, the carbon footprint and greenhouse gas intensity of investee companies PAI's are evaluated relative to industry peers, and the threshold is reached where companies are determined to be among the highest within any of the MSCI-defined Global Industry Classification Standard (GICS) Level 3 industries with respect to greenhouse gas intensity or carbon footprint.

Where the Investment Manager has determined that differentiation is less meaningful or for PAIs which are more qualitative in nature (e.g. PAIs relating to the UNGC principles and the OECD Guidelines) significant harm is assessed by evaluating, among others, companies' activities, management policies and practices or unresolved controversies using third party data. For some indicators (e.g. board gender diversity and gender pay gap evaluation), the Investment Manager looks at third party data regarding, among others, discrimination and workforce diversity controversies along with evaluation of the presence of women in the decision-making bodies of the company.



**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

***- How have the indicators for adverse impacts on sustainability factors been taken into account?***

The Investment Manager uses PAI data in its investment research tools, portfolio management tools and trading compliance system. Issuers who fail to pass the Investment Manager’s criteria may not be held in portfolios and designated as Sustainable Investments. Assessment against the PAIs for the purpose of ensuring that Sustainable Investments do not significantly harm environmental or social objectives includes the following:

- Exclusions with respect to the production of controversial weapons, revenues associated with thermal coal extraction or power generation and revenues associated with the production and generation of oil sands are applied in accordance with the Exclusions Policy in order to avoid significant activities associated with controversial weapons and fossil fuels PAIs.
- The Investment Manager uses third party data to understand the negative impact an issuer may have on a given PAI and sets pre-defined thresholds within each PAI which are applied on a pre-trade basis as applicable for the asset class. Where third party data indicates that an issuer is potentially doing significant harm according to the PAI threshold, the Investment Manager conducts additional due diligence using a variety of internal research and external data to determine whether the data is accurate.
- Where third party data is unavailable regarding a specific PAI, the Investment Manager conducts additional due diligence using a variety of internal research and external data (including by looking at public disclosures or reporting or via outreach directly to the issuer itself) to assess that the issuer is not doing significant harm.
- Where third party data indicates that the thresholds set for one or more PAIs have been reached and such data is found to be correct, the Investment Manager may further evaluate and engage with the issuer to ensure the issuer is aware of the harm or identified controversy and is taking active steps to mitigate or remediate such harm including with respect to transitioning away from potentially harmful activities. Where PAI data may not be relevant to investments in specific issuer projects such as use-of-proceeds bonds, the Investment Manager may also further evaluate the specific nature of such projects or activities in order to confirm that such activities are not being carried out in a way that causes significant harm.
- Where an issuer is confirmed to have reached a relevant PAI threshold and is not engaging with the Investment Manager to address it, the Investment Manager will not invest in such an issuer or will seek to divest in the best interests of Fund investors.

***- How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:***

Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is tested as part of the Investment Manager’s process to identify Sustainable Investments. Assessment of management policies and practices are necessary to determine alignment. Misalignment with the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights may be determined where the Investment Manager identifies UN Global Compact non-compliance, inadequate policies and/or unresolved controversies.

Issuers assessed to be in breach of the OECD Guidelines for Multinational Enterprises or the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of human Right are not eligible to be classified as Sustainable Investments.

The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

Any other sustainable investments must also not significantly harm any environmental or social objectives.



## Does this financial product consider principal adverse impacts on sustainability factors?

Yes

No

The Fund's Sustainable Investments are assessed against each of the mandatory corporate and/or sovereign PAIs to determine that the Sustainable Investments do not cause significant harm to any environmental or social sustainable objective. In addition, by virtue of the Fund's existing investment guidelines, the Fund takes certain, but not all, of the PAIs into consideration either directly or indirectly on all or a portion of the Fund as follows:

1. The Fund does not invest in companies which produce controversial weapons in accordance with the Exclusion Policy - PAI: Exposure to controversial weapons.
2. The Fund does not invest in companies principally involved in the extraction of thermal coal, the production of thermal coal energy and the extraction of oil sands in accordance with the Exclusion Policy - PAIs: Exposure to companies active in the fossil fuel sector; Share of non-renewable energy consumption and production.

While these restrictions consider certain of the PAIs, such consideration does not necessarily eliminate Fund's exposure to such PAIs altogether. In addition, the extent to which these restrictions impact the investment process may be limited where such investments are outside of the scope of the investment objective of the Fund. The Fund further commits to report on these Principal Adverse Impacts periodically with such report to be included in the annual report of the Fund. For more information please see [www.wellingtonfunds.com/sfdr](http://www.wellingtonfunds.com/sfdr).



## What investment strategy does this financial product follow?

The investment strategy guides investment decisions based on factors such as investment objectives and risk tolerance.

The investment strategy used to attain the environmental and/or social characteristics promoted by the Fund is described below.

In line with the Fund's thematic approach, the Fund will seek to promote sustainable economic development by investing at least 75% of the Fund's net assets in companies that are considered Sustainable Investments.

The Fund will not invest in companies identified as involved in the mining of thermal coal. The Fund also considers any revenue generated from thermal coal, excluding any company that generates >25% of its revenue from thermal coal energy generation (in addition to the criteria set out in the Exclusion Policy).

Subject to any stricter criteria at set out above, the Fund applies the Exclusion Policy which sets out issuers which are excluded where they have been identified using a combination of third party and/or internal analysis as having a predefined level of involvement in the following areas:

1. Production of controversial weapons, including cluster munitions, landmines, biological/ chemical weapons, depleted uranium weapons, blinding laser weapons, incendiary weapons, and/or non-detectable fragments;
2. Production of nuclear weapons;
3. Production, distribution, retail or supply of tobacco related products;
4. Thermal coal extraction or thermal coal-based power generation; and
5. Production and generation of oil sands (also known as tar sands).

Further details about how exclusions are researched and implemented by Wellington Management, including the full detail of the thresholds for involvement, may be found in the section of the Prospectus titled "Exclusions".

### *What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?*

The Fund excludes companies that are involved in the mining of thermal coal. The Fund also excludes companies that generates more than 25% of their revenue from thermal coal energy generation.

At least 75% of the Fund's net assets are invested in companies that are considered Sustainable Investments.

*What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?*

Not applicable. The Fund does not currently commit to reduce the scope of investments by a minimum rate.

*What is the policy to assess good governance practices of the investee companies?*

Good governance practices of investee companies are assessed by the Investment Manager with regards to a variety of factors including, where materially relevant, management structures and decision-making, accountability to shareholders, compensation structures, corporate culture, compliance with applicable law and the absence of negative events which are likely to have a material adverse impact on the financial returns of the company. In assessing good governance, the Investment Manager considers its proprietary G ratings where available in accordance with its Good Governance Assessment Policy. These ratings rely on a combination of internal and/or external data inputs.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**What is the asset allocation planned for this financial product?**

**Asset allocation** describes the share of investments in specific assets.

During normal market conditions, a minimum of 75% of the Fund's net assets will be aligned to the E/S characteristics of the Fund.

In line with the Fund's thematic approach, the Investment Manager will seek to promote sustainable economic development by investing at least 75% of the Fund's net assets in companies that are considered Sustainable Investments. Although the proportion of Sustainable Investments with environmental or social objectives may vary over time, the Investment Manager will maintain at least 10% in Sustainable Investments with an environmental objective and at least 40% in Sustainable Investments with a social objective.

On occasion, due to possible settlement mismatch related to investor flows or market holidays during times when large subscriptions are received, the portion of the Fund which is not aligned with the environmental or social characteristic may affect the Fund's ability to meet the commitment as described above under normal market conditions. The Investment Manager does not consider these short-term fluctuations to materially impact the Fund's ability to attain its environmental or social characteristics.

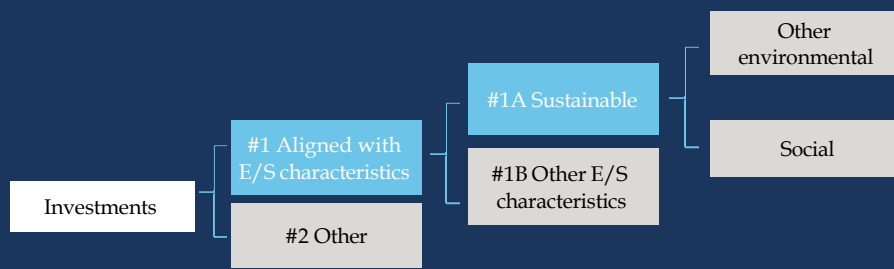
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

**Transitional activities are** activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.

- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

*How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?*

Not applicable. Derivatives are not used by the Fund for the purpose of attaining the environmental and/ or social characteristics promoted by the Fund.



*To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?*

Although the Fund commits to invest in Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of EU Taxonomy-aligned investments is 0%.

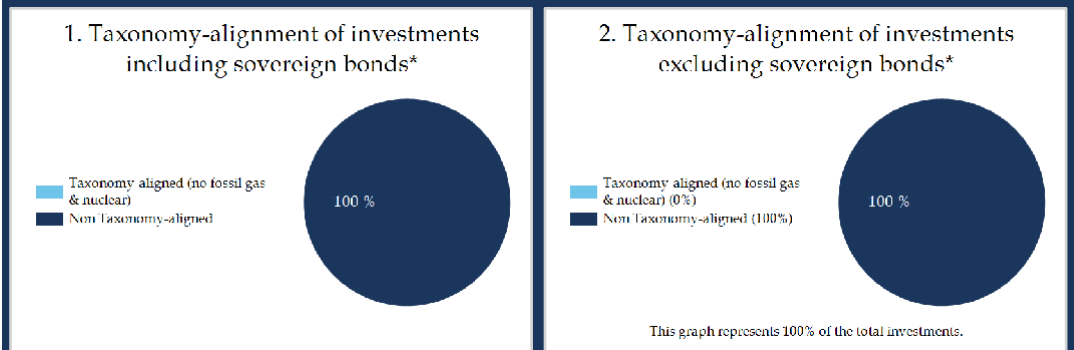
*Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?*

- Yes
- In fossil gas       In nuclear energy
- No

#### Wellington Emerging Market Development Fund

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objectives - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

The two graphs below show in dark blue the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures.

### What is the minimum share of investments in transitional and enabling activities?

Not applicable. Although the Fund commits to invest in Sustainable Investments within the meaning of the SFDR, the minimum share of investments in transitional and enabling activities is 0%.

are sustainable investments with an environmental objective **that do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

Although the Fund commits to make Sustainable Investments with an environmental objective within the meaning of the SFDR, the minimum share of such investments with an environmental objective not EU Taxonomy-aligned is 10%. These investments could be aligned with the EU Taxonomy but the Investment Manager is not currently in a position to specify the exact proportion of the Fund's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position is kept under review as the underlying rules are finalized and the availability of reliable data increases over time.



### What is the minimum share of socially sustainable investments?

Minimum 40% of the Fund's net assets are invested in socially sustainable investments.



### What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

The investments under '#2 Other' may include cash and cash equivalents for liquidity purposes, derivatives for hedging and/or investment purposes or investments in securities which may create exposure to multiple underlying issuers such as collective investment schemes or index positions. It may also include any securities where data to measure the environmental and/or social characteristics is not available, is not used to meet the environmental or social characteristics, or does not meet the environmental or social characteristics promoted by the Fund. Except with regards to the Exclusions Policy, these do not have any minimum environmental or social safeguards. However, some minimum safeguards may still be considered to apply to the extent such holdings are aligned with one or more but not all of the Fund's environmental or social characteristics.



### Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Not applicable. A reference benchmark has not been designated for the purpose of attaining the environmental and/or social characteristics promoted by the Fund.

### How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

*How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*

Not applicable.

*How does the designated index differ from a relevant broad market index?*

Not applicable.

*Where can the methodology used for the calculation of the designated index be found?*

Not applicable.



#### **Where can I find more product specific information online?**

More product specific information can be found on the website:

[https://docs.wellington.com/list/public/documents?query=TEMPLATE\\_TYP=SustainabilityRelatedDisclosure%26in\(fundId,F000028\)%26languageCd=EN&recentMatch=true&download=true](https://docs.wellington.com/list/public/documents?query=TEMPLATE_TYP=SustainabilityRelatedDisclosure%26in(fundId,F000028)%26languageCd=EN&recentMatch=true&download=true)