FIDEURAM ASSET MANAGEMENT (IRELAND) dac
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MANAGEMENT COMPANY
of the Luxembourg Mutual Investment Fund
with multiple sub-funds

FONDITALIA
(the "**Fund**")

NOTICE TO THE UNITHOLDERS

Notice is hereby given to the unitholders of the relevant below listed sub-funds of the Fund (the "**Sub-Fund(s)**") that the Board of Directors of the Management Company (the "**Board of Directors**") has decided the following changes in the prospectus of the Fund (the "**Prospectus**"), as from July 31, 2023 (the "**Effective Date**").

1. Introduction of a benchmark for the Sub-Funds Fonditalia Global Income, Fonditalia Cross Asset Style, Fonditalia Diversified Real Asset and Fonditalia Ethical Investment

The Sub-Funds Fonditalia Global Income, Fonditalia Cross Asset Style, Fonditalia Diversified Real Asset and Fonditalia Ethical Investment which are currently not managed in reference to benchmark, will use as from the Effective Date the following benchmarks for portfolio construction, risk and performance measurement**.** The introduction of the benchmarks aims at providing more transparency to investors as to how the Sub-Funds' investment objective are going to be achieved*.*

Fonditalia Global Income will be managed in reference to a benchmark which consists of the arithmetical weighted average of following indices:
- 5% J.P. Morgan GBI-EM Global Diversified Composite Unhedged EUR,
- 5% J.P. Morgan EMBI Global Diversified Composite Index, total return in USD, and converted in Euro,
- 35% Bloomberg Global Aggregate Corporate Total Return Index Unhedged EUR,
- 25% MSCI World Price Index in Euro,
- 30% FTSE World Government Bond Index Unhedged EUR.

Fonditalia Cross Asset Style will be managed in reference to a benchmark which consists of the arithmetical weighted average of following indices:
- 10% Bloomberg Barclays World Govt Inflation-Linked All Maturities TR Hedged EUR,
- 10% JP Morgan Cash Index Euro 6 months in Euro,
- 20% Bloomberg Barclays Global Aggregate Corporate Total Return Index Unhedged EUR,
- 25% Bloomberg Barclays Global G7 Total Return Index Value Hedged EUR ,
- 35% MSCI ALL Countries World Net Total Return EURO Index.

Fonditalia Diversified Real Asset will be managed in reference to a benchmark which consists of the arithmetical weighted average of following indices:

- 20% MSCI World Price Index in Euro,
- 10% Bloomberg Commodity Index in Euro,
- 5% MSCI World Energy Sector Price Index in Euro,
- 30% Bloomberg Global Inflation Linked Unhedged EUR,
- 30% FTSE World Government Bond Index Unhedged EUR,
- 5% MSCI World Real Estate Price Index in Euro.

Fonditalia Ethical Investment will be managed in reference to a benchmark which consists of the index "Bloomberg MSCI Euro Corporate Green Bond 5% Capped Index" Total Return Index, Value Unhedged, converted in EUR.

Consequently, the performance fee calculation methodology will change from a high on high with hurdle rate model (section "Performance fee for absolute return sub-funds") to a benchmark-relative model (section "Relative return sub-funds that charge performance fee"):

Previously:

Absolute return sub-funds that charge performance fee	Hurdle rate*	Performance fee rate**
Fonditalia Global Income	2.10%	15%
Fonditalia Diversified Real Asset	2.10%	15%
Fonditalia Cross Asset Style Factor	2.10%	20%
Fonditalia Ethical Investments	0.70%	10%

(**)% of the excess between the new High on High (HoH) at Unit-Class level increased by the hurdle rate and the last HoH increased by the hurdle rate, during the previous five years. The hurdle rate is of (*)%. The performance fee is calculated/accrued daily and paid annually. The actual amount will vary depending on how well your investment performs. The aggregated cost estimation above includes the average over the last 5 years.

As from the Effective Date:

Relative return sub-funds that charge performance fee	Reference benchmark	Performance fee rate***
Fonditalia Global Income	Official benchmark as disclosed the in sub-fund's investment policy.	15%
Fonditalia Diversified Real Asset		15%
Fonditalia Cross Asset Style Factor		20%
Fonditalia Ethical Investments		10%

(***)% of the positive difference between the performance of the Sub-Fund/Unit-Class and the benchmark (as indicated in the Sub-Fund's investment policy) over the calendar year. The performance fee is calculated/accrued daily and paid annually. A performance fee may be paid even when the sub-fund over performs the benchmark but with a negative absolute performance. The actual amount will vary depending on how well your investment performs. The aggregated cost estimation above includes the average over the last 5 years.

2. Change of the investment policy of the Sub-Funds Fonditalia Cross Asset Style Factor and Fonditalia Ethical Investment

For **Fonditalia Ethical Investment**, a change of the investment policy has been decided inter alia in order to i) favour investments in "green and social bonds" in line with the sub fund's ESG profile and ii) gain greater flexibility in pursuing the Sub-Fund's investment objective through a wider range of financial derivative instruments such as swaps.

For **Fonditalia Cross Asset Style Factor**, a change of the investment policy has been decided inter alia in order to achieve greater flexibility through the introduction of derivative financial instruments such as interest rate, total return swaps and inflation swaps, which are complementary to those used so far.

Further details have been added in relation to the rating downgrade procedure and the average credit quality of the fixed income securities.

The Board of Directors has decided to change the investment policies of the Sub-Funds with effect from the Effective Date as follows:

FONDITALIA CROSS ASSET STYLE FACTOR	**(30) FONDITALIA CROSS ASSET STYLE FACTOR,** expressed in EURO, has as ~~investment~~ objective ~~to reach a positive return, in absolute terms, through investment in~~the development of the assets over time, by following a flexible approach in relation to asset exposure to achieve the investment objective, investing, depending on the market conditions, in transferable securities including, for example, equity, government and non-government debt securities, other transferable securities, money market instruments, deposits with credit institutions, units and/or shares of UCITS and/or other undertakings for collective investment (including Exchange Traded Funds complying with article 41(1)(e) of the 2010 Law) which comply with Environmental, Social and Governance ("ESG") criteria (altogether the "**Target Funds**"), in Exchange Traded Commodities and in financial derivative instruments (listed and OTC), such as, for example, futures, options (Exchange Traded/OTC), swaps and "contracts for difference", interest rates swaps, inflation swaps, total and excess return swaps, on all types of financial instruments. (…) ~~The risk and the return of the sub-fund shall be principally linked to two factors: the selection of the Target Funds/Exchange Traded Commodities and derivatives instruments.~~ The net direct and indirect exposure to equities instruments will not exceed ~~60~~50% of the sub-fund's net assets. (…) The indirect exposure may be achieved via ETFs, total return swaps or CDS on both index level or single names. Debt securities will typically have an expected average credit quality of not below BBB according to Standard & Poor's or equivalent as measured by credit rating agencies. The expected average rating is for information purposes only. (…) Being understood that some securities rated "CCC" may be considered as distressed securities. In accordance with the above mentioned prohibition, if a security eligible for the sub-fund is rated CCC, the Investment Manager will perform an analysis in order to determine if such security is a distressed security, if so the sub-fund

	will not invest in such security. In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Investment Manager will analyse the situation in the best interest of the Company in order to take actions. Actions may include without limitation selling the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net asset value. (…) Total Return Swap: • Maximum portion of assets that can be subject to TRS: 100%. • Expected portion of assets that will be subject to TRS: 50%. ~~**Although the sub-fund has as objective a positive return in absolute terms, neither the market evolution nor the management strategies make it possible to guarantee a positive return and can involve a risk for the invested capital. The management strategy aims at containing and optimizing the exposure to the market risks; however, the sub-fund maintains a sensitivity to the unfavorable evolution of the interest rates, exchange rates, the credit and the prices of the stock markets.**~~
FONDITALIA ETHICAL INVESTMENT	**(38) FONDITALIA ETHICAL INVESTMENT**, expressed in EURO, aims to ~~generate a positive total return through a combination of both income and capital growth,~~outperform the benchmark with an investment process based on a biding environmental, social and governance ("ESG") and sustainability factors analysis for the selection of the instruments. The sub-fund invests in: ~~a) bonds issued by governmental, public, supranational and corporate entities, including below investment grade rating entities, selected using a combination of the approaches described below:~~ • ~~*Screening approach:* the sub-fund will adopt a two-sided approach to systematically screening the issuer and/or the specific securities on the basis of the following ESG analysis:~~ i. ~~a "Positive Screening" approach is adopted to assess and measure the ability of each issuer and/or the related securities to generate a positive social and/or environmental impact, retaining the ones with more favourable ESG characteristics and ratings;~~ ii. ~~a "Negative Screening" approach is adopted, to exclude investments which are deemed harmful to people and/or the environment involved in severe controversies (such as securities of issuer that are involved in sectors of: controversial weapons; conventional weapons (armaments); fossil fuel; tobacco, pornography and gambling. As well as securities of issuers that have breached United Nations Global Compact Principles ("UNGC")), and/or with lower ESG profiles;~~ • ~~*ESG best in class approach:* all other factors been equal, the sub-fund selects investments based on rigorous environmental, social and governance guidelines, with the~~

~~aim to retain the issuers showing the highest ESG ratings;~~

~~b) shares/units of funds targeting a combination of financial returns and social or environmental good (e.g. microfinance funds, fair trade funds, social bond funds, education funds, environmental funds) and in shares/units of equity funds (selected according to an ESG best in class approach), up to 10% of its net assets;~~

~~c) other government bonds with an investment grade rating;~~

~~d) listed shares of companies generating positive social or environmental externalities (e.g. financial institutions offering financial services mainly to low-income segments of the population, to micro-entrepreneurs, and to small-medium enterprises), selected according to an ESG best in class approach, up to a maximum of 20% of its net assets.~~

~~To be eligible for inclusion in the portfolio, each security is subject to the Investment Advisor's ESG scoring assessment for the different instruments in the portfolio, green bonds, equities and funds. For each of these assets the Investment Advisor adopts a specific ESG evaluation model that takes into account the peculiarities of each instrument and at the same time provides a coherent rating scale.~~

~~With reference to the ESG screened fixed income allocation, the sub-fund invests~~

a) Primarily in Green, Social, Sustainability and Thematic Bonds according to the International Capital Market Association's ("ICMA") bond labelling methodology that includes three categories: Green Bonds, Social Bonds and Sustainability Bonds.
b) Residually in Government bonds and bonds issued by governmental, public, supranational entities with an investment grade rating and bonds issued by other corporate entities.
c) In Shares/Units of funds and Exchange Traded Funds (ETF) up to 10% of its net assets.

The good governance practices are assessed through the scoring methodology provided by the Investment Advisor in relation to governance aspects. For more information on the Investment Advisor's methodology please refer to: www.mspartners.org.

Debt securities will typically have an expected average credit quality of BBB+ (according to S&P) or equivalent as measured by credit rating agencies. The expected average rating is for information purposes only. Securities will be deemed non-investment grade if, at the time of purchase, they are classified below BBB- or equivalent, based on rating agencies or equivalent defined on the basis of the internal valuation model implemented.

~~The sub-fund may invest in emerging markets, which in investment terms are those economies that are still developing.~~

The sub-fund will not invest in distressed securities nor in default securities. Some "CCC" rated securities may be considered as distressed securities. If a security eligible for the sub-fund is rated "CCC", the Management Company will perform an analysis in order to determine if such security is a distressed security, if so, the sub-fund will not invest in such security. The Management Company will ensure that the investment limit in such security will be respected. In case of downgrade of an existing investment or other events leading to qualify a security of the sub-fund as distressed or default, the Management Company through its pricing committee, will analyse the situation in the best interest of the Sub-fund in order to

	take actions. Actions may include, without limitation, selling the security at low value. In any event the Management Company shall ensure that distressed and / or default securities held by the sub-fund shall not exceed 10% of its net assets. The sub-fund could be exposed to unhedged currencies different from Euro. Moreover, the sub-fund may use financial derivative instruments for the purpose of risk hedging and for investment purposes. The derivatives instruments used will be - but will not necessarily be restricted to - listed derivatives (as futures and options on bonds and interest rates) and over the counter derivatives like credit default swaps (on indices, baskets and on single names), interest rate swaps, forward foreign exchange contracts, unfunded total return swaps (where the underlying assets could be, without being limited to, fixed income, foreign exchange, fixed income futures, index futures and options on financial derivative instruments), credit default options. (...) *Total Return Swap:* • Maximum portion of assets that can be subject to TRS: ~~0~~20%. • Expected portion of assets that will be subject to TRS: ~~0~~5%.

3. Clarification of the investment policy of the Sub-Fund Fonditalia – Diversified Real Asset

The Board of Directors has decided to clarify the investment of the Sub-Fund regarding the investments in sugar and wheat for which a 5% investment limit was included in the investment policy. The Sub-Fund invests in these commodities by gaining exposure to the Bloomberg Commodity Index (the "**Benchmark**"), therefore the percentage of each commodity is determined by the Benchmark itself. As the exposure may vary, the explicit 5% investment limit has now been removed from the Sub-Fund's investment policy. Unitholders should note that this is not a material change.

4. Change of the investment manager of the Sub-Funds Fonditalia Global Income and Fonditalia Diversified Real Asset

Due to a reorganization of some activities between Fideuram Asset Management (Ireland) dac ("**FAMI**") and Fideuram Asset Management UK Ltd (hereinafter "**FAM UK**"), the Board of Directors has decided to delegate the investment management of the Sub-Funds Fonditalia Global Income and Fonditalia Diversified Real Asset to FAM UK as of July 3, 2023. The change in the investment management role from FAMI to FAM UK is due to the relocation to London of the portfolio manager currently managing the Sub-Funds in FAMI, strengthening the core capabilities of FAM UK in the area of multi assets and asset allocation investment strategies, which is in the best interest of the unitholders. For the avoidance of doubt, the change of the investment manager does not have any impact on the investment policy and fee structure of the Sub-Funds, which remain unchanged.

5. <u>Website publication of the notices to unitholders</u>

The management regulations of the Fund have been amended in order to reflect that notices to unitholders will be sent to the unitholders, published on a website or in newspapers, if necessary or as required. Shareholders are informed that unless otherwise required by the Fund's management regulations, Luxembourg law or by the law of the country(ies) in which the Sub-Funds are distributed, all notices to unitholders will from now on be published on the website www.fideuramireland.ie/en/legal_documentation/ and as set out in more detail in the Prospectus.

It has been further clarified in the management regulations of the Fund that the notice of any mergers will be sent to unitholders. Unitholders of the relevant Sub-Funds may, for a period established by the Board of Directors of the Management Company – which may be no less than one (1) month and shall be indicated in the notice to unitholders – request that their units be redeemed free of charge, as set out in more detail in the Prospectus.

Unitholders of the abovementioned Sub-Funds, who disagree with the abovementioned changes of items 1, 2 and 5 may request the redemption of their units free of any redemption charges during the period of one (1) month, beginning on June 28, 2023 until the Effective Date.

Updated Prospectus, Management Regulations and Packaged Retail and Insurance-based Investment Products Key Investor Information Document (PRIIPs KIDs) reflecting these changes will be available at the registered offices of the Management Company, FIDEURAM ASSET MANAGEMENT (IRELAND) dac, the Depositary Bank, STATE STREET BANK INTERNATIONAL GmbH, Luxembourg branch and the authorized Distributors as well as on the website of the Management Company (http://www.fideuramireland.ie/).

All capitalised terms used herein and not otherwise defined shall have the meaning ascribed to such terms in the Prospectus.

Dublin, June 28, 2023

The Management Company