Key Investor Information

This document provides you with key investor information about this fund. It is not marketing material. The information is required by law to help you understand the nature and the risks of investing in this fund. You are advised to read it so you can make an informed decision about whether to invest. Unless otherwise defined in this document, all words and expressions defined in the Company's current Prospectus shall have the same meaning herein.



New Capital Strategic Portfolio UCITS Fund (the "Fund"), a sub-fund of New Capital UCITS Fund Plc (the "Company")

New Capital Strategic Portfolio UCITS Fund USD Ord Acc. (the "Share Class") – ISIN: IE00BTJRKF96 The management company of the Fund is KBA Consulting Management Limited (the "Manager")

Objective and Investment Policy

Objective: The Fund's objective is to achieve long-term capital appreciation.

Policy: The Investment Manager combined an integrated top-down macro-economic view and bottom-up proprietary analysis in seeking exposure either directly or indirectly (through the use of derivatives) to the following asset classes:

- debt securities (government/corporate bonds, notes or bills which may have fixed or floating rates of interest and need not be of investment grade);
- (ii) cash and money market instruments;
- (iii) shares and equity related securities (convertible bonds, warrants);(iv) collective investment schemes, subject to a maximum limit of
- 50% of the NAV in open-ended funds;
- (v) real estate (through real estate investment trusts and/or real estate operating companies); and
- (vi) commodities (through commodity index-linked derivative instruments) subject to maximum exposure of 20% of the NAV.

Such debt securities, shares and equity-related securities may be listed and/or traded on Recognised Markets worldwide and there is no industry or geographical focus.

The Fund may use derivatives for investment and efficient portfolio management purposes with a level of risk which is consistent with the risk profile of the Fund, such as futures, swaps (interest rate, currency, credit default swaps, swaptions, total return swaps, equity swaps), options, contracts for difference and FX forwards. The use of leverage generated by the use of derivatives will not exceed the Net Asset Value of the Fund.

The Investment Manager has discretion in managing the investments of the Fund. Any income arising from this Share Class will be accumulated.

Portfolio transaction costs may have an impact on the performance of the Fund and are paid out of the assets of the Fund in addition to the charges detailed below.

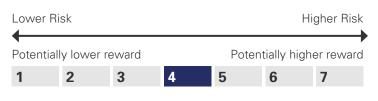
Benchmark: The Fund's benchmark is the BofA Merrill Lynch USD 1M Deposit Offered Rate Constant Maturity Index plus a risk premium of 5 percentage points per annum and may be used for comparative purposes only.

Profile of typical investor: The Fund is suitable for investors seeking capital growth and income over a 5- to 10-year time horizon with a medium level of volatility.

Dealing: Shares in the Fund can be bought and sold daily (every Business Day of the Fund).

Further Information: Please refer to the Prospectus for more detailed information.

Risk and Reward Profile



The Fund is in category 4 as it has a medium level of volatility. The risk category shown is not guaranteed and may shift over time.

Historical data may not be a reliable indicator for the future risk profile of the Fund. The lowest risk category does not mean a "risk-free investment". The Fund is also subject to risks which are not included in the calculation of the risk-reward indicator.

Liquidity risk: The risk that assets may not be saleable immediately at a price consistent with that observed for valuation purposes.

Currency risk: Investors not investing in their local currency will additionally be exposed to the fluctuation of the exchange rate between their local currency and the currency class in which they are invested.

Hedging risk: The Fund utilises forward exchange rate contracts to minimise currency risk, forward contracts do not precisely mirror movements in the market exchange rate which can result in differences in performance between share classes.

Commodity risk: Investment in commodity index-linked derivative instruments may subject the Fund to greater volatility as the index may be affected by index volatility, change in overall markets as well as factors affecting a particular industry/commodity.

Further information: The Prospectus for this Fund gives you more details about all the risks for this Fund – see under "Practical Information" for how to obtain a copy.

Charges

The charges you pay are used to pay the costs of running the Fund, including the costs of marketing and distributing it. These charges reduce the potential growth of your investment.

One-off charges taken before or after you invest

Entry charge	5.00%
Exit charge	3.00%
Charges taken from the fund over a year	
Ongoing charges	1.77%

Charges taken from the fund under certain specific conditions

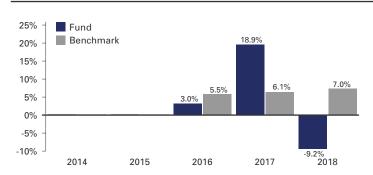
Performance fee

The entry charges shown are maximum charges. In some cases, you might pay less, you can find this out from your financial adviser.

The ongoing charges figure is based on the expected expenses for the year ending 31 December 2019. This figure may vary from year to year and it excludes portfolio transaction costs and any performance fees if applicable.

For more information about charges, please see the "Fees and Expenses" section of the Prospectus.

Past Performance



The Fund was established on 18 December 2014 and the representative share class was launched on 26 February 2015.

The past performance is calculated in USD.

The performance figures include all ongoing charges and exclude any entry charges or exit charges. Past performance is not necessarily a guide to the future performance of the Fund.

Practical Information

The depositary bank of the Fund is HSBC Institutional Trust Services (Ireland) DAC.

The Net Asset Value of the Share Class is calculated in USD and is available on Bloomberg, Morningstar and Reuters.

The Fund is a sub-fund of the Company, an umbrella fund with segregated liability between sub-funds. You can find out more information about the umbrella fund in the Prospectus. The Prospectus and periodic reports are prepared in the name of the Company. Copies of the Prospectus and the latest annual and half-yearly report are available free of charge from www.newcapitalfunds.com.

Subject to the conditions set down in the Prospectus, you are entitled to switch from one share class to another, either in the Fund or in another sub-fund of the Company. Please refer to the Prospectus for further information on how to switch.

The Fund is subject to the tax laws and regulations of Ireland. Depending upon your country of residence, this might have an impact on your investment. For further details please consult your financial adviser.

This Key Investor Information Document is specific to the Share Class but is considered representative of other share classes of this Fund, namely:

USD Inst. Acc. ISIN: IE00BTJRKG04 GBP Ord. Acc. ISIN: IE00BTJRLV20 GBP Inst. Acc. ISIN: IE00BTJRLW37 EUR Ord. Acc. ISIN: IE00BTJRLX44 EUR Inst. Acc. ISIN: IE00BTJRLY50 CHF Ord. Acc. ISIN: IE00BTJRLZ67 CHF Inst. Acc. ISIN: IE00BTJRM089 AUD Ord. Acc. ISIN: IE00BTJRM196 AUD Inst. Acc. ISIN: IE00BTJRM204 SGD Ord. Acc. ISIN: IE00BTJRM311 SGD Inst. Acc. ISIN: IE00BTJRM428 USD X Acc. ISIN: IE00BTJRM865 GBP X Acc. ISIN: IE00BD2MTK73 CHF X Acc. ISIN: IE00BYT3SM56 EUR X Acc. ISIN: IE00BD73LD24

Information relating to these share classes is available in the Prospectus.

Details of the up-to-date remuneration policy of the Manager (including a description of how remuneration and benefits are calculated and the identity of persons responsible for awarding the remuneration and benefits) are available on www.kbassociates.ie. A paper copy will be made available upon request and free of charge by the Manager.

The Manager may be held liable solely on the basis of any statement contained in this document that is misleading, inaccurate or inconsistent with the relevant parts of the Prospectus for the Fund.

The Fund is authorised in Ireland and regulated by the Central Bank of Ireland.

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This key investor information is accurate as at 18 February 2019.