

PROSPECTUS

I. GENERAL FEATURES

- **Name:**
MILLESIMA 2021
- **Legal form and Member State in which the UCITS was established:**
Mutual Fund (fonds commun de placement - FCP) under French law.
- **Date created and expected term:**
This UCITS was approved by the AMF on 8 January 2016.
The UCITS was created on 25 January 2016 for a period of 99 years.
- **Summary of the management offer:**
The UCITS has seven unit classes.
The UCITS does not have any sub-funds.

Unit types	ISIN code	Allocation of distributable income	Currency	Minimum initial subscription amount*	Target subscribers	Risk systematically hedged
C units	FR0013076478	Net income: Accumulation Net capital gains realised: Accumulation	Euro	1 unit	All subscribers	None
CR unit	FR0013128022	Net income: Accumulation Net capital gains realised: Accumulation	Euro	1 unit	CR units are accessible to retail investors. They are intended to be marketed exclusively by intermediaries specifically selected by the Management Company	None
D units	FR0013076486	Net income: Distribution Net capital gains realised: Accumulation and/or Distribution and/or Carried forward	Euro	1 unit	All subscribers	None
E units	FR0013076494	Net income: Accumulation Net capital gains realised: Accumulation	Euro	1 unit	All subscribers	None
I units	FR0013076502	Net income: Accumulation Net capital gains realised: Accumulation	Euro	EUR 500,000	Legal entities and institutional investors on a proprietary or third-party basis**	None
I USD H unit	FR0013128527	Net income: Accumulation Net capital gains realised: Accumulation	US Dollars	USD 500,000	Legal entities and institutional investors on a proprietary or third-party basis**	EUR/USD currency risk
ID units	FR0013076510	Net income: Distribution Net capital gains realised: Accumulation and/or Distribution and/or Carried forward	Euro	EUR 500,000	Legal entities and institutional investors on a proprietary or third-party basis**	None

* The minimum initial subscription amount does not apply to subscriptions that may be made by the Management Company, the custodian, or entities belonging to

the same group.

** As well as all unitholders who subscribed to the UCITS before 07/02/2019.

➤ **Address from which the latest annual report and interim statement may be obtained:**

The latest annual and interim reports shall be sent to unitholders within eight working days of receipt of a written request sent to the management company, Edmond de Rothschild Asset Management (France), 47 rue du Faubourg Saint-Honoré, 75401 Paris Cedex 08, France.

II. DIRECTORY

➤ **Management company:**

EDMOND DE ROTHSCHILD ASSET MANAGEMENT (FRANCE)

A public limited company (société anonyme) with Executive and Supervisory Boards, approved as an asset management company by the AMF on 15 April 2004 under number GP 04000015.

Registered office: 47 rue du Faubourg Saint-Honoré - 75401 Paris Cedex 08

➤ **Custodian:**

EDMOND DE ROTHSCHILD (FRANCE)

A public limited company (société anonyme) with a Board of Directors and a Supervisory Board, approved by the Banque de France-CECEI (French Credit Institutions and Investment Firms Committee) as a credit institution on 28 September 1970.

Registered office: 47 rue du Faubourg Saint-Honoré, 75401 Paris Cedex 08, France

Description of the custodian's duties:

Edmond de Rothschild (France) performs the duties defined by the applicable regulations, namely:

Custody of the UCITS' assets,
checking that the management company's decisions are lawful,
monitoring the UCITS' cash flows.

Control and management of conflicts of interest:

The custodian EdR (France) and the management company EdRAM (France) both belong to the Edmond de Rothschild Group. In accordance with the applicable regulations, they have each implemented policies and procedures that are appropriate to their size, their organisation and the nature of their activities, in order to take reasonable steps intended to prevent conflicts of interest that might result from this link.

Delegates:

The custodian has delegated the custody of financial securities to the sub-custodian, CACEIS Bank.

The description of the delegated custodial duties, the list of sub-custodians of CACEIS Bank and information relating to conflicts of interest that may result from these delegations are available on the CACEIS website: www.caceis.com

Updated information is made available to investors within eight business days upon written request from the bearer to the custodian.

➤ **Delegated transfer agent:**

EDMOND DE ROTHSCHILD (FRANCE) is responsible, by way of delegation, for the functions related to fund administration: centralising subscription and redemption orders and managing the UCITS' unit or share registry.

➤ **Institution delegated with the task of maintaining the issuing account:**

EDMOND DE ROTHSCHILD (FRANCE)

A public limited company (société anonyme) with a Board of Directors and a Supervisory Board, approved by the Banque de France-CECEI (French Credit Institutions and Investment Firms Committee) as a credit institution on 28 September 1970.

Registered office: 47 rue du Faubourg Saint-Honoré – 75401 Paris Cedex 08

➤ **Sub-custodian:**

CACEIS Bank

Société Anonyme (Public limited company)

Credit institution approved by the CECEI

Registered office: 1–3, place Valhubert – 75013 Paris, France

Postal address: 1–3, place Valhubert – 75206 Paris Cedex 13, France

Acting on behalf of the custodian, the sub-custodian is responsible for the safekeeping of the UCITS' units, for their liquidation, and for the delivery-versus-payment (DVP) of orders sent and received by the custodian. It is also responsible for the financial administration of the UCITS' units (such as securities transactions and the collection of income).

➤ **Statutory auditor:**

PriceWaterhouseCoopers Audit

Registered office: 63, rue de Villiers, 92200 Neuilly-sur-Seine, France

Signatory: Frédéric Sellam

➤ **Marketer:**

EDMOND DE ROTHSCHILD ASSET MANAGEMENT (FRANCE)

A public limited company (société anonyme) with a Board of Directors and a Supervisory Board, approved as an asset management company by the AMF on 15 April 2004 under number GP 04000015.

Registered office: 47 rue du Faubourg Saint-Honoré, 75401 Paris Cedex 08, France

Telephone: 00 33 1 40 17 25 25

email: contact@edram.fr

Fax: 00 33 1 40 17 24 42

Website: www.edram.fr

Edmond de Rothschild Asset Management (France) oversees the promotion of the UCITS and may delegate the actual marketing activities to a third party of its choice. Moreover, the management company is not aware of the identity of all the marketers of the UCITS' units who are permitted to act without any official agreement.

Regardless of which company is ultimately appointed marketer, the Edmond de Rothschild Asset Management (France) sales teams are available to provide information or answer any questions that unitholders might have regarding the UCITS. They may be contacted at the company's registered office.

➤ **Delegation of the Fund's accounting:**

CACEIS FUND ADMINISTRATION

Public limited company with a share capital of €5,800,000

Registered office: 1-3 Place Valhubert, 75013 Paris, France

Postal address: 1-3 Place Valhubert, 75206 Paris Cedex 13, France

The Management Company, Edmond de Rothschild Asset Management (France), delegates the accounting for the UCITS to Caceis Fund Administration.

The primary corporate purpose of Caceis Fund Administration is the valuation and accounting and administrative management of financial portfolios. As such, it focuses on processing financial information relating to portfolios, the calculation of net asset values, bookkeeping for the portfolios, the production of accounting and financial statements and information and the production of various regulatory and special reports.

➤ **Financial management delegated to:**

Edmond de Rothschild Asset Management (France) delegates part of the financial management of the UCI to:

Edmond de Rothschild (Suisse) S.A.

Société anonyme (public limited company) incorporated under Swiss law, governed by the Swiss Federal Act on Banks and Savings Banks of 08 November 1934 and listed in the Swiss Trade and Companies Register under no. CHE-105.978.847.

Registered office: 18 rue de Hesse, 1204 Geneva, Switzerland

This delegated financial management covers currency hedging for the hedged units.

➤ **Institutions authorised to receive subscription and redemption orders:**

EDMOND DE ROTHSCHILD (FRANCE)

47 rue du Faubourg Saint-Honoré – 75401 Paris Cedex 08

CACEIS Bank, Luxembourg Branch

5 Allée Scheffer, L-2520 Luxembourg

III. OPERATING & MANAGEMENT PROCEDURES

3.1 GENERAL FEATURES:

➤ Unit characteristics:

- ISIN Codes:

C units:	FR0013076478
CR unit:	FR0013128022
D units:	FR0013076486
E units:	FR0013076494
I units:	FR0013076502
I USD H unit:	FR0013128527
ID units:	FR0013076510

- Rights:

The Fund is a co-ownership of financial instruments and deposits whose units are issued and redeemed at the request of unitholders at their net asset value, plus or minus charges and fees, as appropriate. Unitholders have co-ownership rights to the Fund's assets in proportion to the number of units they hold.

- Entry on a register:

The units will be listed on Euroclear France and will be treated as registered securities prior to listing, and as bearer securities once listed. The rights of holders of registered units will be represented by an entry in a register held by the custodian and the rights of holders of bearer units will be represented by an entry in the account held by the central custodian (Euroclear France) by way of sub-affiliation in the name of the sub-custodian.

- Voting rights:

No voting rights are attached to the Fund's units. Decisions concerning the Fund are taken by the Management Company.

- Type of unit: Bearer

C, CR, D, E, I, I USD H and ID units are expressed in whole numbers or in thousandths of units.

➤ Year-end:

The day of the last net asset value of the month of December.

➤ Taxation:

Since mutual funds have a co-ownership structure, they are exempt from corporation tax and are deemed to be transparent.

As such, any gains or losses realised when Fund units are redeemed (or when the Fund is dissolved) are capital gains or losses and are taxed as capital gains or losses on transferable securities, applicable to each unitholder depending on their own situation (country of residence, natural person or legal entity, place of subscription, and so on). Such gains may be subject to withholding tax if the unitholder is not a resident of France for tax purposes. In addition, unrealised capital gains may, in some cases, be subject to taxation. Lastly, unitholders are advised that C, CR, E, I and I USD H units are accumulation units and D and ID units are distribution units.

Prior to subscribing to the Fund, unitholders unsure of their tax situation are advised to contact a tax adviser for further information about the specific tax treatment that will be applicable to them.

➤ Specific tax system:

None

3.2 SPECIFIC PROVISIONS:

➤ Classification:

Bonds and other debt securities denominated in Euros

➤ **Exposure to other UCITS, AIFs or foreign investment funds:**

Up to 10% of net assets.

➤ **Investment objective:**

Millesima 2021 aims to obtain an annual performance, net of management fees, exceeding 3.6% for E units, 3.8% for C and D units, 3.95% for I USD H units and 4.4% for CR, I and ID units over the recommended holding period, i.e. from the Fund's launch date to 31 December 2021.

➤ **Benchmark index:**

The UCITS has no benchmark index. Its investment scope is not represented by existing indices.

➤ **Investment strategy:**

The strategy implemented aims to create a buy-and-hold portfolio of securities, maturing on 31 December 2021, that are intended to be retained by the UCITS until maturity and which will be representative of the expectations of the management company regarding the high-yield credit markets (speculative securities for which the risk of issuer default is higher) of member countries of the OECD, the G20, the European Economic Area or the European Union (with no restriction on geographical distribution); the UCITS may also invest up to 20% of its net assets in emerging countries outside the geographic areas outlined above.

The manager will seek to select the most attractive issues in order to maximise the portfolio's risk/return ratio. It will show a degree of stability in its allocation, though the allocation may be subject to adjustments intended to reflect the management team's convictions.

Securities maturing on or before 31 December 2021 will be held by the UCITS until maturity.

Securities maturing before 31 December 2021 will be reinvested in other bond or money market securities at the prevailing market conditions.

Securities maturing after 31 December 2021 will be sold by 31 December 2021 at the latest at the prevailing market conditions.

The UCITS may be fully invested in short-term securities with maturities of less than 3 months, particularly during its launch phase.

From 1 January 2022, the UCITS will be managed on the money market and with reference to the euro money market average rate (Eonia). After approval from the AMF, the UCITS will then opt either for a new investment strategy or for dissolution, or it will be merged with another UCITS.

To achieve the management objective, the strategy will primarily combine a sector-based approach and credit analysis.

■ Top-down approach

The top-down approach is primarily based on a macroeconomic analysis of the various sectors or countries explored as part of the portfolio allocation. It leads to the determination of market scenarios created on the basis of the management team's expectations.

This analysis specifically determines:

- the degree of exposure to different economic sectors
- the distribution between various ratings within the investment grade and high-yield categories (speculative securities for which the risk of issuer default is higher).

The top-down analysis provides an overview of the portfolio. This is complemented by a stock-picking process (bottom-up approach).

■ Bottom-up approach

This process aims to identify issuers within the same sector that have a higher relative value than others, thus appearing more attractive.

The way issuers are selected is based on a fundamental analysis of each company.

The fundamental analysis focuses on evaluating criteria such as:

- the clarity of the company's strategy;

- its financial health (consistency of cash flow through different economic cycles, ability to honour its debts, etc.);
- the “strategic” nature of the company, to predict the likelihood of government intervention in the event of default or a significant deterioration of its financial situation.

Within the universe of the selected issuers, the choice of exposures will be based on characteristics such as the issuer’s rating, the liquidity of the securities or their maturity.

The fundamental analysis model, intended to identify the securities with the highest upside potential, is based on a structure with managing analysts specialising in credit markets. Following an in-depth analysis of the various companies, the bottom-up process is further refined. This process leads to the choice of preferred investment instruments (direct investments in securities, credit default swaps, etc.) for exposure to selected issuers.

In order to hedge its assets and/or achieve its management objective, without seeking overexposure, the UCITS may use financial contracts traded on regulated markets (futures, listed options) or over-the-counter markets (options, swaps, etc.) up to a limit of 100% of its net assets. In this situation, the manager may obtain exposure to or synthetic hedging of indices, industry sectors or geographic regions. To this end, the UCITS may take positions to hedge the portfolio against certain risks (interest rate, credit and foreign exchange) or choose to be exposed to interest rate risk and credit risk. With this in mind, the manager may adopt strategies chiefly aimed at anticipating or protecting the UCITS against the risk of default by one or more issuers or exposing the portfolio to the credit risks of one or more issuers. These strategies will be implemented by purchasing or selling protection via credit default swap credit derivatives, based on a single benchmark entity or on indices (iTraxx or CDX).

Strategies may also be implemented to reduce exchange rate risk and/or to manage interest rate risk with the use of financial contracts, specifically futures, options, forward contracts or swaps.

The UCITS’ sensitivity to interest rates may vary between 0 and 6.

■ Exposure to the equity market and to convertible bonds

None.

■ Currencies

The euro exchange risk will be hedged. Nevertheless, a residual currency risk may remain.

► **Portfolio assets**

- **Debt securities and money market instruments (up to 100% of the net assets, with a maximum of 100% directly invested in securities):**

General characteristics:

Sensitivity to interest rates	-	[0 ; 6]
Geographical region of issuers	OECD, G20, European Economic Area or European Union	Up to 100%
	All geographical regions, including emerging countries	Up to 20%

Breakdown of private/public debt:

Up to 100% of the portfolio may be invested in private debt from issuers located in a member state of the OECD, the European

Union, the European Economic Area and the G20. Up to 20% of the portfolio’s net assets may be invested in private debt from issuers domiciled in emerging countries.

Up to 35% of the portfolio may also be invested in the public debt of a state or entity of a Member State of the OECD, the European Union, the European Economic Area or the G20.

Criteria related to ratings:

The portfolio may invest in *high-yield* securities (speculative securities for which the risk of issuer default is

higher) that may be considered speculative (with a long-term Standard & Poor's or equivalent rating below BBB- or with an equivalent internal rating from the Management Company). Up to 10% of the portfolio may be invested in securities rated between CCC+ and CCC-; the remaining securities will have a minimum rating of B-.

Taking into account the existence of a maximum maturity for the Fund, the portfolio may invest up to 100% of its net assets in "*investment grade*" securities (with a long-term Standard and Poor's rating or equivalent above BBB- or with an equivalent internal rating from the Management Company) in the form of bonds, debt securities or money market instruments.

Thus, as the Fund approaches the end of its term, and as a result of the portfolio securities reaching maturity, money market instruments will be the preferred choice for reinvestments (either directly or through a UCI).

The UCITS may be fully invested in short-term securities with maturities of less than 3 months, particularly during its launch phase.

The selection of securities is not based automatically and exclusively on the rating criterion. It is mainly based on an internal analysis. Prior to each investment decision, the Management Company analyses each security on criteria other than its rating. In the event that an issuer's rating is downgraded (Standard & Poor's rating or an equivalent internal rating from the Management Company), the Management Company must conduct a detailed analysis in order to decide whether to sell or retain the security, so as to maintain the rating objective.

Legal form:

Debt securities of any type, including:

- fixed, variable or adjustable rate bonds,
- EMTNs (Euro Medium Term Notes),
- inflation-linked bonds,
- negotiable debt securities,
- savings certificates,
- BTFs (French fixed-rate treasury bills),
- treasury bills,
- Euro commercial papers (short-term negotiable securities issued in euros by a foreign entity),
- short-term negotiable securities,
- medium-term negotiable securities.

The portfolio may invest in PIK notes (payment in kind notes are bonds for which interest payments are not made systematically in cash).

■ **Shares or units of other French undertakings for collective investment or other foreign UCITS, AIFs or investment funds:**

The UCITS may hold up to 10% of its assets in units or shares of French or foreign UCITS, AIFs or retail investment funds or foreign investment funds, or any foreign investment fund that meets the four conditions set out in Article R. 214-13 of the French Monetary and Financial Code classed as money market or bond funds. These UCIs may be managed by the Management Company or by an affiliated company.

■ **Financial contracts (subject to an overall off-balance sheet limit of 100% of net assets):**

In order to limit significantly the overall counterparty risk of instruments traded over the counter, the Management Company may receive cash collateral that will be deposited with the custodian and will not be reinvested.

Types of markets invested in:

In order to hedge its assets and/or achieve its management objective, without seeking overexposure, the UCITS may use financial contracts traded on regulated markets (futures, listed options) or over-the-counter markets (options, swaps, etc.). In this situation, the manager may obtain exposure to or synthetically hedge indices, industry sectors or geographic regions. To this end, the UCITS may take positions to hedge the portfolio against certain risks (interest rate, credit and currency) or choose to be exposed to interest rate risk and credit risk.

Risks in which the manager intends to trade:

- Interest rate risk

- Currency risk
- Credit risk

Types of trade:

- Hedging
- Exposure

Strategy for the use of derivatives:

- hedging the portfolio against certain risks (interest rate, credit, currency risk)
- exposing the portfolio to interest rate risks
- constructing a synthetic exposure to assets and risks (interest rate, credit)
- increasing exposure to the market

Type of instruments used:

- Interest rate options
- Forward rate agreements
- Interest rate futures
- Interest rate swaps
- Currency options
- Currency swaps
- Currency futures
- Credit derivatives (credit default swaps)

The UCITS will not use Total Return Swaps.

The maturity dates of financial contracts will be consistent with the UCITS' investment horizon.

Exposure to these financial instruments, markets, interest rates and/or some of their parameters or components resulting from the use of financial contracts may not exceed 100% of the net assets.

■ **Securities with embedded derivatives (up to 100% of net assets):**

To achieve its management objective, the UCITS may invest in callable and puttable bonds, structured Euro Medium Term Notes (EMTNs) or warrants.

■ **Cash borrowings:**

The UCITS does not intend to borrow cash. However, a liability position may exist from time to time due to transactions associated with the UCITS' cash flow (investments and divestments in progress, subscription/redemption transactions, etc.), up to a limit of 10% of its net assets.

■ **Temporary purchases and sales of securities:**

In the interests of efficient portfolio management and without deviating from its investment objectives, the UCITS may make temporary purchases and sales of securities involving eligible financial securities or money market instruments, up to 100% of its net assets. More precisely, these transactions will consist of repurchase and reverse repurchase agreements linked to interest rate and credit products of eurozone countries, and will be carried out in the context of cash management and/or the optimisation of the UCITS' income.

The expected proportion of assets under management that will be the subject of such a transaction will be 10% of the net assets.

The counterparties to the transactions of these contracts are first-rate financial institutions domiciled in OECD countries that have a minimum rating of "investment grade" (rating greater than or equal to BBB- by Standard & Poor's or equivalent, or a rating deemed equivalent by the Management Company).

These counterparties do not have any influence on the composition or management of the UCITS' portfolio.

In order to limit significantly the overall counterparty risk of instruments traded over the counter, the Management Company may receive cash collateral that will be deposited with the custodian and will not be reinvested.

Further information on remuneration for temporary sales and purchases of securities is provided in the "Charges and fees" section.

➤ **Risk profile:**

Your money will be invested primarily in financial instruments selected by the Management Company. These instruments will be subject to market trends and fluctuations.

The risk factors described below are not exhaustive. It is the responsibility of each investor to analyse the risk associated with such an investment and to form their own opinion independently of the Edmond de Rothschild Group by obtaining as much specialist advice on such matters as is necessary in order to ensure this investment is appropriate for their financial and legal position and investment horizon.

- Risk of capital loss:

The UCITS does not guarantee or protect the capital invested, so investors may not recover the full amount of their initial capital invested even if they retain the units for the recommended investment period.

- Discretionary management risk:

The discretionary management style is based on anticipating trends on the various markets (equities, bonds, money market, commodities and currencies). There is a risk that the UCITS may not be invested in the best-performing markets at all times. The performance of the UCITS may therefore be lower than the investment objective, and a drop in its net asset value may lead to negative performance.

- Credit risk:

The main risk linked to debt securities and/or money market instruments such as treasury bills (BTFs and BTANs) or short-term negotiable securities is that of issuer default, due either to the non-payment of interest and/or the non-repayment of capital. Credit risk is also linked to the downgrading of an issuer. Unitholders are reminded that the net asset value of the UCITS is likely to fall if a total loss is recorded on a financial instrument following default by an issuer. The inclusion of debt securities in the portfolio, whether directly or through UCIs, exposes the UCITS to the effects of variations in credit quality.

- Credit risk linked to investment in speculative securities:

The UCITS may invest in issues from companies rated as non-investment grade by a rating agency (with a rating below BBB- according to Standard & Poor's or equivalent) or with an equivalent internal rating issued by the Management Company. These issues are "speculative" securities and present a higher risk of issuer default. This UCITS should therefore be considered partly speculative and as being aimed specifically at investors who are aware of the risks inherent in investing in such securities. As a result, the use of high-yield securities (speculative securities presenting a higher risk of issuer default) may incur a greater risk of a fall in the net asset value.

- Interest rate risk:

Exposure to interest rate products (debt securities and money market instruments) makes the UCITS sensitive to interest rate fluctuations. Interest rate risk might result in a fall in the value of the security and, therefore, the NAV of the UCITS in the event of a change in the yield curve.

- Risk linked to investing in emerging markets:

The UCITS may be exposed to emerging markets. In addition to the individual risks of each issuing company, external risks exist, particularly in these markets. Furthermore, investors' attention is drawn to the fact that the operating and oversight conditions in these markets may differ from the standards that prevail on major international exchanges. Consequently, the holding of such securities may increase the portfolio's risk profile. A fall in the market may thus be more marked and rapid than in developed countries, and the net asset value may fall further and more quickly and finally, companies held in the portfolio may have states as shareholders.

- Liquidity risk:

The markets in which the UCITS trades may occasionally be affected by a lack of liquidity. These market conditions may impact the terms of the prices under which the UCITS may have to liquidate, initiate or modify positions.

- Risk linked to derivatives:

The UCITS may invest in forward financial instruments.

The use of financial contracts may result in the risk of a sharper, more abrupt drop in net asset value than in the markets in which the UCITS invests.

- Counterparty risk:

Counterparty risk results from the use by the UCITS of financial contracts that are traded OTC and/or

temporary purchases and sales of securities. These transactions potentially expose the UCITS to the risk of default by one of its counterparties and where applicable, a fall in its net asset value.

- Risks associated with temporary purchases and sales of securities:

The use of these transactions and the management of their collateral may involve specific risks such as operational risks or custody risk. These transactions may therefore lead to a negative effect on the net asset value of the UCITS.

- Legal risk:

This is the risk of inadequately drafting contracts concluded with counterparties for temporary purchases and sales of securities.

➤ **Guarantee or capital protection:**

None

➤ **Eligible subscribers and typical investor profile:**

C, D and E units: all subscribers

CR units: All subscribers; these units may be marketed to retail investors (non-professional or professional) exclusively in the following cases:

- Subscription as part of independent advice provided by a financial advisor or regulated financial entity,
- Subscription as part of non-independent advice, with a specific agreement that does not authorise them to receive or retain trailer fees,
- Subscription by a financial entity regulated on behalf of its client as part of a management mandate.

In addition to the management fees charged by the Management Company, each investor may be required to pay management or advisory fees charged by each financial advisor or regulated financial entity. The management company is not party to these agreements.

Units are not registered for marketing in all countries. They are therefore not open to subscription for retail investors in all jurisdictions.

I, I USD H and ID units: Legal entities and institutional investors dealing on their own account or on behalf of third parties, as well as all unitholders who subscribed to the UCITS before 07/02/2019

The person responsible for ensuring that the criteria related to the ability of subscribers or purchasers have been observed and that they received the required information is the person entrusted with effectively implementing marketing for the UCI.

This UCITS is intended for investors wishing to optimise their bond investments through a portfolio that aims to generate a regular return that exceeds a French government bond maturing in October 2021 over the recommended investment period.

The units of this UCITS are not and will not be registered in the United States under the US Securities Act of 1933, as amended ("Securities Act 1933"), or under any other law of the United States. These units may not be offered, sold or transferred in the United States (including its territories and possessions), nor may they benefit, directly or indirectly, any US Person (within the meaning of Regulation S of the Securities Act 1933).

The appropriate amount to invest in this UCITS will depend on your individual circumstances. To determine that amount, investors are encouraged to seek professional advice in order to diversify their investments and determine the proportion of their financial portfolio or assets to be invested in this UCITS, more specifically in view of the recommended investment period and exposure to the aforementioned risks, their personal wealth, requirements and specific objectives. In any event, unitholders must diversify their portfolio sufficiently to avoid being exposed solely to the risks of this UCITS.

- Minimum recommended investment period: until 31 December 2021

➤ **Procedures for determining and allocating distributable amounts:**

Distributable Amounts	C, CR, E, I and I USD H units	D and ID units
Allocation of net income	Accumulation	Distribution
Allocation of net realised gains or losses	Accumulation	Accumulated (fully or partially) or Distributed (fully or partially) or Carried forward (fully or partially) based on the decision of the Management Company

Where distribution units are concerned, the Management Company of the UCITS may decide to make one or more advance payments on the basis of the financial positions certified by the Statutory Auditor.

➤ **Distribution frequency:**

Accumulation units: not applicable

Distribution units: annual with the possibility of interim dividends. Payment of distributable income is made within a maximum of five months of the financial year-end and for interim dividends, within one month of the date of the statement certified by the statutory auditor.

➤ **Unit characteristics:**

The UCITS has 7 unit classes: C, CR, D, E, I, I USD H and ID units

The C unit is denominated in Euros and expressed in units or thousandths of a unit.

The CR unit is denominated in euros and expressed in units or thousandths of units.

The D unit is denominated in Euros and expressed in units or thousandths of a unit.

The E unit is denominated in Euros and expressed in units or thousandths of a unit.

The I unit is denominated in Euros and expressed in units or thousandths of a unit.

The I USD H unit is denominated in US Dollars and expressed in units or thousandths of a unit.

The ID unit is denominated in Euros and expressed in units or thousandths of a unit.

➤ **Subscription and redemption procedures:**

- Date and frequency of net asset value calculation:

Daily, with the exception of public holidays and days on which the French markets are closed (according to the official Euronext Paris S.A. calendar).

- Initial NAV:

C units: 100 €

CR unit: 100 €

D units: 100 €

E units: 100 €

I units: 100 €

I USD H unit: USD 100

ID units: 100 €

- Minimum initial subscription:

C units: 1 unit.

CR unit: 1 unit.

D units: 1 unit.

E units: 1 unit.

I units: 500,000 €.

I USD H unit: USD 500,000.

ID units: 500,000 €.

- Minimum subsequent subscription:

C units: one-thousandth of a unit.

CR unit: 1 thousandth of a unit.

D units: 1 thousandth of a unit.

E units: 1 thousandth of a unit.

I units: 1 thousandth of a unit.

I USD H unit: 1 thousandth of a unit.

ID units: 1 thousandth of a unit.

- Subscription and redemption procedures:

Orders are executed as set out in the table below.

Subscription and redemption procedures are expressed in business days.

D is the net asset value calculation day:

<i>Centralisation of subscription orders</i>	<i>Centralisation of redemption orders</i>	<i>Date of order execution</i>	<i>Publication of the net asset value</i>	<i>Payment of subscriptions</i>	<i>Payment of redemptions</i>
D, before 12:30 p.m.	D, before 12:30 p.m.	D	D+1	D+3	D+3*

* In the event of the dissolution of the Fund, redemptions will be settled within a maximum of five business days.

Subscriptions and redemptions of units C, CR, D, E, I, I USD H and ID are executed per amount, per unit or per thousandth of a unit.

For tax purposes, conversions from one unit class to another are treated as a redemption followed by a new subscription. Consequently, the tax system applicable to each subscriber depends on the tax provisions applicable to the subscriber's individual circumstances and/or the investment jurisdiction of the UCITS. In case of uncertainty, subscribers should contact their adviser to obtain information about the tax system applicable to them.

Unitholders are advised that orders sent to institutions responsible for receiving subscription and redemption orders must take into account the deadline for centralising orders that is applied to the transfer agent, Edmond de Rothschild (France). Consequently, the other institutions named may apply their own, earlier deadline, in order to take into account transfer times to Edmond de Rothschild (France).

- Option provided to limit or halt subscriptions:

The UCITS may stop issuing new units as of 1 July 2016. It will then be closed to all subscriptions (except in the case of a concurrent subscription and redemption by the same investor for the same amount executed on the same net asset value date).

- Place and method of publication of the net asset value:

Edmond de Rothschild Asset Management (France)

47 Rue du Faubourg Saint-Honoré, 75401 Paris Cedex 08, France

➤ **Charges and fees:**

- Subscription and redemption fees:

Subscription and redemption fees increase the subscription price paid by the investor or decrease the redemption price. The fees charged by the UCITS serve to offset the charges that it incurs in investing and divesting investors' holdings. Fees which are not paid to the Fund are paid to the Management Company, Promoter, etc.

<i>Fees payable by the investor on subscriptions and redemptions</i>	<i>Basis</i>	<i>Rate scale C, CR, D, E, I, I USD H and ID units</i>
Subscription fee not payable to the UCITS	Net asset value x Number of units	C units: Maximum 4%
		CR units: Maximum 4%
		D units: Maximum 4%
		E units: Maximum 4%
		I units: None
		I USD H unit: None
		ID units: None
Subscription fee payable to the UCITS	Net asset value x Number of units	C units: None
		CR unit: None
		D units: None
		E units: None
		I units: None
		I USD H unit: None
		ID units: None
Redemption fee not payable to the UCITS	Net asset value x Number of units	C units: None
		CR unit: None
		D units: None
		E units: None
		I units: None
		I USD H unit: None
		ID units: None
Redemption fee payable to the UCITS	Net asset value x Number of units	C units: 1% until 31/12/16 and nil thereafter
		CR units: 1% until 31/12/16 and nil thereafter
		D units: 1% until 31/12/16 and nil thereafter
		E units: 1% until 31/12/16 and nil thereafter
		I units: 1% until 31/12/16 and nil thereafter
		I USD H unit: 1.00% until 31/12/2016 and nil thereafter
		ID units: 1% until 31/12/16 and nil thereafter

Exemption: if a subscription request coincides with a redemption order by the same investor for an equal amount or quantity carried out on the same net asset value date, no subscription fee or redemption fee accruing to the UCITS will be applied.

- **Operating and management fees:**

These charges cover all the costs invoiced directly to the UCITS, except transaction charges.

Transaction charges include intermediary charges (brokerage fees, local taxes, etc.) as well as any

transaction fees that may be charged by the custodian and the management company, in particular.

The following fees may be charged on top of operating and management fees:

- Performance fees
- Transaction fees charged to the UCITS
- Fees linked to temporary purchases and sales of securities, as applicable.

For more information about the fees charged to the UCITS, please refer to the Key Investor Information Document for the corresponding units.

Fees charged to the UCITS	Basis	Rate scale
Management fees. Management fees include the investment management fees and administrative fees external to the management company: custodian, appraiser and statutory auditor	Net assets of the UCITS	C units: Max. 1.20% incl. taxes*
		CR units: Max. 1.05% incl. taxes*
		D units: Max. 1.20% incl. taxes*
		E units: Max. 1.40% incl. taxes*
		I units: Max. 0.60% incl. taxes*
		I USD H unit: Max. 0.60% incl. taxes*
		ID units: Max. 0.60% incl. taxes*
Transaction fees paid to service providers: Custodian: between 0% and 50% Management Company: between 50% and 100%	Payable on each transaction	On transactions: 0.24% incl. taxes* for non-equity transactions Nil for transactions involving equities and similar financial instruments On coupon redemptions: Max. 1.20% incl. taxes*
Performance fee	Net assets of the UCITS	C units: None
		CR units: None
		D units: None
		E units: None
		I units: None
		I USD H unit: None
		ID units: None

*Including all taxes.

For this activity, the Management Company has not opted for VAT.

**Apart from possible outperformance fees

Any retrocession of management fees for the underlying UCIs and investment funds collected by the UCITS will be repaid to the UCITS. The rate of management fees applicable to the underlying UCIs and investment funds will be valued by taking into account any trailer fees collected by the UCITS.

In the exceptional case that a sub-custodian applies a transaction fee not described in the provisions mentioned above for a specific transaction, a description of the transaction and the transaction fees charged will be provided in the management report of the UCITS.

- Procedure for selecting intermediaries:

In accordance with the AMF General Regulations, the Management Company has established a Best Selection/Best Execution policy for intermediaries and counterparties. The purpose of this policy is to select, according to various predetermined criteria, the brokers and intermediaries whose execution policy will achieve the best possible results when executing orders. The Edmond de Rothschild Asset

Management (France) Policy is available on its website at www.edram.com.

- Calculation and allocation of the proceeds resulting from temporary purchases and sales of securities and any equivalent transaction under foreign law:

Repurchase agreements are conducted through Edmond de Rothschild (France) according to the prevailing market conditions at the time of the transaction.

The costs and expenses linked to these transactions are borne by the UCITS. Income generated by the transaction is paid in full to the UCITS.

IV. COMMERCIAL INFORMATION

➤ Information for investors

Subscription and redemption orders for units are centralised by:

Edmond de Rothschild (France) (delegated transfer agent)

A public limited company (société anonyme) with Executive and Supervisory Boards, approved by the Banque de France-CECEI (French Credit Institutions and Investment Firms Committee) as a credit institution on 28 September 1970.

Registered office: 47 rue du Faubourg Saint-Honoré, 75401 Paris Cedex 08, France

Telephone: 33 (0) 1 40 17 25 25

All requests for information about the UCITS may be sent to the promoter.

The Management Company may send the composition of the UCI's portfolio to certain unitholders or their service providers, on the understanding that it is confidential information for the calculation of the regulatory requirements related to Directive 2009/138/EC (Solvency II) in accordance with the guidance issued by the AMF, once more than 48 hours has passed since the publication of the net asset value.

Information relating to the consideration of the criteria concerning compliance with social, environmental and governance quality objectives in the management of this UCITS will appear on the website: www.edram.fr and is included in the UCITS' annual report for the current financial year.

V. INVESTMENT RULES

UCITS compliant with the investment rules set out in European Directive 2009/65/EC.

VI. TOTAL RISK

Method used to calculate total risk: the UCITS uses the commitment method to calculate the total risk ratio of the UCITS associated with financial contracts.

VII. ASSET VALUATION RULES

➤ Asset valuation rules:

The net asset value per unit is calculated in accordance with the valuation rules specified below. The procedures are set out in detail in the notes to the annual financial statements. The valuation is calculated on the basis of closing prices.

- Securities traded on a French or foreign regulated market are valued at their market price. The valuation at the reference market price is calculated in accordance with the procedures determined by the

Management Company and set out in detail in the notes to the annual financial statements;

- Debt securities and similar negotiable securities that are not traded in large volumes are valued using an actuarial method, with the rate used being that of issues of equivalent securities plus or minus any differential representing the intrinsic characteristics of the issuer of the security. However, negotiable debt securities with a residual maturity of three months or less and with low sensitivity may be valued using the straight-line method. The procedures governing the application of these rules are decided by the Management Company and set out in detail in the notes to the annual financial statements;
- For transferable securities and other items on the balance sheet whose prices have not been quoted on the valuation date, the Management Company will adjust their valuation to reflect variations that are likely to arise due to current events. The Statutory Auditor is notified of this decision;
- Futures and options traded on French or foreign organised markets are valued at their market value based on the procedures determined by the Management Company and set out in detail in the notes to the annual financial statements;
- Futures, options and swaps concluded on over-the-counter markets authorised by the regulations applicable to UCITS are valued at their market value or at a value estimated in accordance with the procedures determined by the Management Company and set out in detail in the notes to the annual financial statements;
- Shares in SICAVs and units in mutual funds are valued either on the basis of the last known net asset value or on the basis of the last known market price quoted on the valuation date.

➤ **Accounting method**

The UCITS complies with the accounting rules set forth in the current regulations and, in particular, with the applicable chart of accounts.

The UCITS has chosen the euro as its base accounting currency.

Interest is recorded using the accrued interest method.

All transactions are recorded exclusive of charges.

The value of any security denominated in a currency other than the Euro is translated into Euros on the valuation day.

VIII. REMUNERATION

Edmond de Rothschild Asset Management (France) has a remuneration policy that complies with the provisions of European Directive 2009/65/EC ("UCITS V Directive") and Article 321-125 of the AMF General Regulations which apply to UCITS. The remuneration policy promotes sound and effective risk management and does not encourage risk-taking that is incompatible with the risk profiles of the UCITS under its management. The Management Company has established suitable measures to prevent any conflicts of interest.

For all Management Company employees who are considered to have a material impact on the risk profile of the UCITS, and identified as such each year using a process involving the Human Resources, Risk and Compliance teams, the remuneration policy involves having part of their variable remuneration (which must remain within reasonable limits in relation to fixed remuneration) deferred over three years.

The Management Company decided not to establish a remuneration committee within the Management Company, choosing instead to delegate it to its parent company Edmond de Rothschild (France). It is organised in accordance with the principles set out in Directive 2009/65/EC.

Details of the Management Company's remuneration policy are available on the company's website: <http://www.edmond-de-rothschild.com/site/united-kingdom/en/asset-management>. A written copy of the policy is available free of charge from the Management Company upon request.

MILLESIMA 2021

MUTUAL FUND (FCP)

MANAGEMENT REGULATIONS

TITLE I

ASSETS AND UNITS

Article 1 - Co-ownership units

Co-owners' rights are represented by units, with each unit corresponding to the same fraction of the Fund's assets (or the sub-fund, if applicable). Each unitholder has a co-ownership right to the Fund's assets proportional to the number of units they hold.

The term of the Fund is 99 years starting from its creation date, except in the event of early dissolution or extension as set out in these regulations.

The characteristics of the different classes of units and their eligibility requirements are specified in the Fund's prospectus.

Possibility of consolidation or division of units.

The Fund has 7 unit classes: C, CR, E, I and I USD H are accumulation units and D and ID are distribution units.

The Management Company's governing body may decide to split C, CR, D, E, I, I USD H and ID units into thousandths, referred to as fractions of units.

The provisions of the regulations governing the issue and redemption of units shall apply to fractions of units, whose value shall always be proportionate to that of the units they represent. Unless otherwise provided, all other provisions of the regulations relating to units shall apply to fractions of units without any need to make a specific provision to that end.

The governing body of the management company may also decide, at its sole discretion, to divide the units by issuing new units, which shall be allocated to unitholders in exchange for their existing units.

Article 2 - Minimum capital

Units may not be redeemed if the assets of the Fund fall below €300,000. If the assets remain below this amount for a period of 30 days, the Management Company shall make the necessary provisions to liquidate the UCITS concerned or to carry out one of the operations mentioned in Article 411-16 of the AMF General Regulations (transfer of the UCITS).

Article 3 - Subscription and redemption of units

Units are issued at any time at the request of the unitholders based on their net asset value, plus any subscription fees.

Redemptions and subscriptions shall be carried out under the terms and conditions set out in the prospectus.

The Mutual Fund's units may be admitted for trading in accordance with the regulations in force.

Subscriptions must be fully paid up on the day the net asset value is calculated. They may be paid in cash and/or through the contribution of financial instruments. The Management Company is entitled to refuse any securities offered and, for that purpose, must announce its decision within seven days of the date on which the securities were deposited. If they are accepted, the securities contributed in kind shall be valued according to the rules laid down in Article 4 and the subscription shall be based on the first net asset value following the acceptance of the securities in question.

Redemptions may also be made in kind. If a redemption in kind corresponds to a representative portion of the assets of the portfolio, only the signed written agreement of the outgoing unitholder shall be obtained by the UCITS or Management Company. If a redemption in kind does not correspond to a representative portion of the assets of the portfolio, all unitholders shall provide their written agreement authorising the outgoing unitholder to

redeem their units against specific assets, as explicitly defined in the agreement.

As an exception to this rule, if the Fund is an ETF, redemptions on the primary market may be made in kind, with the agreement of the portfolio Management Company and in accordance with the interests of unitholders, under the conditions set out in the Fund's prospectus or regulations. The assets shall then be delivered by the issuing account holder under the conditions set out in the Fund's prospectus.

In general, redeemed assets shall be valued according to the rules set out in Article 4 and the redemption in kind shall be conducted on the basis of the first net asset value following acceptance of the securities concerned.

The redemption price shall be paid by the issuing account holder within five days of the unit valuation date.

However, if in exceptional circumstances the redemption requires the prior sale of assets held in the Fund, this deadline may be extended to a maximum of 30 days.

With the exception of inheritance or an inter vivos gift, the sale or transfer of units between unitholders or unitholders and third parties is considered a redemption followed by a subscription; if this involves a third party, the sale or transfer amount must, where applicable, be supplemented by the beneficiary in order to reach at least the minimum subscription amount stipulated by the prospectus.

Pursuant to Article L. 214-8-7 of the French Monetary and Financial Code, redemption by the Fund of its units, as with the issue of new units, may be suspended on a temporary basis by the Management Company in exceptional circumstances and if the interests of the unitholders so require.

If the net assets of the Fund (or the sub-fund, if applicable) fall below the minimum threshold set by the regulations, no redemptions may be carried out (from the sub-fund in question, if applicable).

Possibility of establishing minimum subscription conditions, in accordance with the procedures set out in the prospectus.

The UCITS may entirely or partially cease to issue units on a temporary or permanent basis, pursuant to paragraph three of Article L.214-8-7 of the French Monetary and Financial Code in circumstances that objectively require the closure of subscriptions, such as a maximum number of units issued, a maximum amount of assets reached or the expiry of a specified subscription period. When this mechanism is triggered, existing unitholders will be notified by any means of its activation, the threshold and the objective situation that led to the decision on partial or total closure. In the event of a partial closure, this notification by any means will specify explicitly the procedures by which existing unitholders may continue to subscribe during this partial closure. Unitholders shall also be notified by any means of the UCITS or management company's decision either to bring the total or partial closure of subscriptions to an end (when the Fund returns below the trigger threshold), or not to bring it to an end (in the event of a change to the threshold or in the objective situation that led to the implementation of this mechanism). Any change to the invoked objective situation or to the trigger threshold must always be made in the best interests of unitholders. The notification by any means will state the precise reasons for these changes.

Article 4 - Calculation of the net asset value

The net asset value of units is calculated in accordance with the valuation rules set out in the prospectus.

TITLE II

MANAGEMENT OF THE FUND

Article 5 - the Management Company

The Fund is managed by the Management Company in accordance with the Fund's investment objectives.

the Management Company shall act in all circumstances in the exclusive interest of the unitholders and shall have the exclusive right to exercise the voting rights attached to the securities held in the Fund.

Article 5 a - Operating rules

The instruments and deposits in which the assets of the UCITS may be invested as well as the investment rules are described in the prospectus.

Article 5 ter – Listing for trading on a regulated market and/or a multilateral trading system

Units may be listed for trading on a regulated market and/or a multilateral trading system in accordance with the regulations in force. If the Fund whose units are listed for trading on a regulated market has an index-based management objective, the Fund must have implemented a system to ensure that the price of its units does not deviate significantly from its net asset value.

Article 6 - The Custodian

The custodian shall perform the tasks entrusted to it by the legal and regulatory provisions in force, as well as those contractually entrusted to it by the Management Company. It must ensure that the decisions taken by the portfolio management company are lawful. Where applicable, it must take all protective measures that it deems necessary. In the event of a dispute with the Management Company, it must inform the AMF.

Article 7 - The Statutory Auditor

A Statutory Auditor is appointed by the Management Company's governing body for six financial years, following the approval of the AMF.

They shall certify the accuracy and truthfulness of accounts.

The Auditor's mandate may be renewed.

The Statutory Auditor must inform the AMF as soon as possible of any fact or decision concerning the undertaking for collective investment in transferable securities of which he/she becomes aware during the course of his/her work, that may:

- 1° Constitute a violation of the legislative or regulatory provisions applicable to the Fund and likely to have a significant impact on the financial position, earnings or assets;
- 2° Affect the conditions or the continuity of its operations;
- 3° Lead to the expression of reservations or the refusal to certify the financial statements.

The Statutory Auditor shall supervise the valuation of the assets and determine the exchange ratios used in the event of a conversion, merger or split.

They shall assess any contribution or redemption in kind within the scope of their responsibility, with the exception of ETF redemptions in kind on the primary market.

They shall check the composition of assets and other items prior to publication.

The Statutory Auditor's fees are determined by mutual agreement between the auditor and the Board of Directors or Management Board of the Management Company on the basis of a schedule of work indicating all of the duties deemed necessary.

The Auditor shall certify the financial statements that serve as the basis for the payment of interim dividends. Their fees are included in the management fees.

Article 8 - The financial statements and the management report

At the end of each financial year, the Management Company prepares the financial statements and draws up a report on the management of the Fund (and each sub-fund, if applicable) during the previous financial year.

the Management Company draws up, at least every six months and under the supervision of the custodian, an inventory of the Fund's assets.

the Management Company shall make these documents available to unitholders within four months following the end of the financial year and shall inform them of the income to which they are entitled: these documents are either sent by post at the specific request of unitholders or made available to them at premises of the Management Company.

TITLE III**ALLOCATION POLICY FOR DISTRIBUTABLE AMOUNTS****Article 9 - Policy for allocating distributable income**

<i>Distributable Amounts</i>	<i>C, CR, E, I and I USD Hunits</i>	<i>D and ID units</i>
Allocation of net income	Accumulation	Distribution
Allocation of realised net gains or losses	Accumulation	Accumulated (fully or partially) or Distributed (fully or partially) or Carried forward (fully or partially) based on the decision of the Management Company

Where distribution units are concerned, the Management Company of the UCITS may decide to make one or more advance payments on the basis of the financial positions certified by the Statutory Auditor.

TITLE IV

MERGER – SPLIT – DISSOLUTION – LIQUIDATION

Article 10 - Merger - Split

the Management Company may either merge all or part of the Fund's assets with the funds of another UCITS or AIF or split the Fund into two or more mutual funds.

Such mergers or splits may only be carried out after unitholders have been notified. and shall give rise to the issue of a new certificate indicating the number of units held by each unitholder.

Article 11 - Dissolution - Extension

If the assets of the Fund (or the sub-fund, if applicable) remain below the amount set in Article 2 above for a period of 30 days, the Management Company shall inform the AMF and dissolve the Fund (or the sub-fund, where applicable), unless it is merged with another mutual fund.

the Management Company may dissolve the Fund (or the sub-fund, if applicable) early. It must inform the unitholders of this decision and will no longer accept subscription and redemption orders as of this date.

the Management Company shall also dissolve the Fund (or the sub-fund, if applicable) if a request is made for redemption of all of the units, if the Custodian's appointment is terminated and no other Custodian has been appointed, or upon expiry of the Fund's term, unless the term is extended.

the Management Company shall inform the AMF by post of the dissolution date and procedure. It shall also send the Statutory Auditor's report to the AMF.

the Management Company may decide to extend the Fund subject to the agreement of the Custodian. Its decision must be taken at least three months prior to expiry of the Fund's term and must be communicated to the unitholders and to the AMF.

Article 12 - Liquidation

In the event of dissolution, the Management Company shall act as liquidator; failing that, a liquidator shall be appointed by a court of law at the request of any interested party. For this purpose, they shall be given the broadest powers to sell the Fund's assets, settle any liabilities and allocate the balance available between the unitholders in cash or in securities.

The Statutory Auditor and the Custodian shall continue to carry out their duties until the liquidation proceedings are complete.

TITLE V

DISPUTES

Article 13 - Competent courts - Election of domicile

Any disputes relating to the Fund that may arise during the course of its existence or liquidation, either between the unitholders or between the unitholders and the Management Company or the Custodian, shall be submitted to the jurisdiction of the competent courts.