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COUNTRY SUPPLEMENT ADDITIONAL INFORMATION FOR INVESTORS IN IRELAND

THREADNEEDLE (LUX) (THE COMPANY)

This Supplement contains specific information for Investors in Ireland investing in a sub-fund of the Company, investment company with variable capital ("société d'investissement à capital variable") formed under the laws of the Grand Duchy of Luxembourg and qualifies in Luxembourg as a UCITS.

This Supplement forms part of and should be read in conjunction with the general description of the Company contained in the Prospectus of the Company dated September 2020 (the Prospectus).

The Directors of the Company, whose names appear in the Directory and on page 5 of the Prospectus in the section with the heading "The SICAV", are the persons responsible for the information contained in the Prospectus and this Supplement. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) such information is in accordance with the facts and does not omit anything likely to affect the importance of such information. The Directors accept responsibility accordingly.

Words and expressions defined in the Prospectus shall, unless the context otherwise requires, have the same meaning when used in this Supplement.

Dated September 2020

Funds of the Company

As of the date of this Supplement the Company has registered the following Funds in the Republic of Ireland:

- Threadneedle (Lux) European Corporate Bond
- Threadneedle (Lux) European High Yield Bond
- Threadneedle (Lux) European Short Term High Yield Bond
- Threadneedle (Lux) STANLIB Africa Equity

Facilities Agent

The Company has appointed J.P. Morgan Bank Administration Services (Ireland) Limited in Dublin as facilities and paying agent (the "Facilities Agent") of the Company in Ireland.

The Facilities Agent shall provide the following facilities to investors at J.P. Morgan House International Financial Services Centre, Dublin 1, Ireland:

- comply with the provisions of the laws and regulations of Ireland, applicable to the Facilities Agent;
- make public such information as may be required by applicable laws and regulations;
- provision of facilities at its Office at which the following documents in the English language can be inspected free of charge and copies obtained free of charge:-
 - the Instrument of Incorporation of the Company in its current form:
 - the current Prospectus, supplements, Key Investor Information documents and any addenda or amendments thereto of the Company;

- (iii) the annual and half-yearly reports of the Company most recently prepared and published; and
- (iv) any other documents required to be made available in accordance with applicable laws and regulations of Ireland.

Issue and Redemption of Shares, Subscription and Payment Procedure

Investors will be required to complete an initial subscription application or other documentation satisfactory to Threadneedle Management Luxembourg S.A. (the "Management Company", a relevant sub-distributor and/or the Registrar and Transfer Agent in order to purchase shares in the Company ("Shares"). Details of the procedure to apply for the purchase of Shares can be found in the section with the heading "Purchase of Shares" on page 46 of the Prospectus.

Requests for redemption must be made in writing to the Registrar and Transfer Agent at its registered office and are irrevocable, except during any period of suspension or deferral of redemption.

Marketing in Ireland

It is the current intention of the Company to market it shares to institutional clients such as asset managers, private banks, family offices, stockbrokers, wealth managers and advisers. At present it is not intended for the Company to offer shares directly to retail investors, however retail investors may invest through brokers or wealth advisers.

Publications

The prices of the Shares will be published electronically on a daily basis at columbiathreadneedle.com. The Company may arrange for the publication of this information in one or more leading financial newspapers in such countries where the Sub-Funds are distributed to the public and may notify the relevant stock exchanges where the Shares are listed.

Documentation in relation to the Company required by applicable laws and regulations to be made available electronically can be obtained at <u>columbiathreadneedle.com</u>.

Irish Taxation

The following information is based on the law in force in Ireland as of the date of this Supplement. This summary deals only with Shares held as capital assets by Irish resident Shareholders and does not address special classes of Shareholders such as dealers in securities or persons that may be exempt from tax such as Irish pension funds and charities. This summary is not exhaustive and Shareholders are advised to consult their own tax advisors with respect to the taxation consequences of the ownership or disposition of Shares

The Company

Provided that the Company is not resident in Ireland for tax purposes and does not carry on a trade or business in Ireland through a branch or agency, it should not have a liability to Irish corporation tax.

Irish Investors

(a) Taxation Generally

Shares in the Company are likely to constitute a "material interest" in an offshore fund for the purposes of Chapter 4 of Part 27 of the Taxes Consolidation Act, 1997.

(b) Reporting of acquisition

An Irish resident or ordinarily resident person acquiring Shares in the Company is required to disclose details of the acquisition in his annual tax return. Where an intermediary in the course of carrying on a business in Ireland acquires Shares in the Company it must report details of the acquisition to the Irish Revenue Commissioners.

(c) Income and capital gains

An Irish resident corporate Shareholder will be liable to corporation tax at 25% on income distributions received from the Company and on gains on disposal of shares in the Company except where the corporate Shareholder holds the Shares as part of its trading activities in which case the rate of corporation tax applicable will be that applicable to trading income. It should be noted that no indexation allowance is available in respect of the gain.

Where an Irish resident or ordinarily resident person who is not a company holds Shares in the Company and receives an income distribution from the Company, that Shareholder will be liable to Irish tax at 41% on the amount of such distribution.

There is a deemed disposal and reacquisition at market value for the purposes of Irish tax of Shares held by an Irish resident or ordinarily resident investor on a rolling 8 year basis where the Shares are acquired on after 1 January 2001. This deemed disposal takes place at market value so that Irish resident or ordinarily resident Shareholders will be subject to tax at the rate of 41% for individuals or 25% for a corporate Shareholder on the increase in value of their Shares at 8 year intervals commencing on the 8th anniversary of the date of acquisition of the Shares.

To the extent that any tax arises on such a deemed disposal, such tax will be taken into account to ensure that any tax payable on the subsequent encashment, redemption, cancellation or transfer of the relevant Shares does not exceed the tax that would have arisen had the deemed disposal not occurred.

Anti avoidance provision

There is an anti avoidance provision imposing higher rates of tax on Irish resident investors in "personal portfolio investment undertakings" (**PPIU**). A PPIU is a fund in which the investor, or a person connected with the investor, has a right under the terms of the fund or any other agreement, to influence the selection of the assets of the fund. If a fund is treated as a PPIU the Irish resident investor can suffer tax at rates of up to 60% (or potentially higher (80%) if returns are not submitted correctly and on time) on amounts received from the fund, or on the rolling 8 year deemed disposal.

Specific exemptions apply where the ability to select the property invested in has been clearly identified in the offshore fund's marketing and promotional literature and the investment is widely marketed to the public.

Withholding obligation on paying agents

If any dividend is paid through an encashment agent established in Ireland such an agent would be obliged to deduct tax from such dividend and

account for this to the Revenue Commissioners. The recipient of the dividend would be entitled to claim a credit for the sum deducted by the paying agent against his tax liability for the relevant year.

Stamp duty

Transfers for cash of Shares in the Company will not be subject to Irish stamp duty.

Gift and inheritance tax

A gift or inheritance of Shares in the Company received from a person who is resident or ordinarily resident in Ireland or received by such a person will be within the charge to Irish capital acquisitions tax. Capital acquisitions tax is charged at a rate of 33% above a tax free threshold which is determined by the amount of the benefit and of previous benefits within the charge to capital acquisitions tax, and the relationship between the person treated as disposing of such shares and the successor or donee. Tax chargeable on a gain arising on a deemed disposal by an individual on their death shall be treated as an amount paid in respect of capital gains tax for the purposes of crediting such amount paid against gift or inheritance tax arising on such death.

Transfers between Funds

The exchange of Shares in one Sub Fund for Shares in another such Sub Fund of an umbrella scheme will not in itself constitute a disposal of Shares and will not give rise to a charge to tax.

FATCA/CRS

To the extent that the Company may be a financial institution for the purposes of FATCA and/or CRS it may require Shareholders to provide information to the Company to comply with its obligations under those, automatic exchange of information, regimes. Further information on FATCA and CRS can be found in the Prospectus.



To find out more visit columbiathreadneedle.com

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