



**THIS DOCUMENT IS IMPORTANT AND
REQUIRES YOUR IMMEDIATE ATTENTION. IF IN DOUBT,
PLEASE SEEK PROFESSIONAL ADVICE.**

31 October 2022

Dear Investor,



Ninety One Global Strategy Fund – sustainability categorisation and other updates to the European Equity Fund

We are writing to you as an investor in the European Equity Fund (the ‘Fund’), a sub-fund of the Ninety One Global Strategy Fund (‘GSF’), to inform you of our approach to the categorisation of the Fund under the European Union’s Sustainable Finance Disclosure Regulation (‘SFDR’) ¹ and to provide you with information on some other updates.

The SFDR is part of a package of legislative measures and seeks to strengthen disclosures made by asset managers and certain other financial services firms to their clients on the Environmental, Social and Governance (‘ESG’) characteristics of financial products.

At Ninety One, sustainability and ESG are not new concepts but they are evolving rapidly. The Investment Manager to the Fund has integrated ESG analysis into its investment decision-making process for several years, building on the tools and knowledge underpinning its approach to sustainability. There is now a greater emphasis placed on the promotion of environmental and social characteristics, and companies and issuers which follow good governance practices. Ninety One believes that these developments will help to further embed ESG analysis, and our thinking on sustainability more broadly, into our investment

¹ The Regulation (EU) 2019/2088 on sustainability-related disclosures in the financial services sector (also known as the ‘Sustainable Finance Disclosure Regulation or ‘SFDR’).

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capabilities and processes. Therefore, we are making changes to include updates to the Fund's investment policy and additional information on the Fund's approach to sustainability and ESG considerations, which will be set out in a new section in Appendix 3: Sustainability Disclosures of the Prospectus to reflect the investment processes that the Investment Manager are currently using which are within the parameters of the Fund's current investment objective and policy.

You are not required to take any action, but we encourage you to read this letter and the Appendix as it contains important information.

Categorisation of the Fund as promoting environmental and social characteristics

The Fund will be categorised as a fund promoting environmental and social characteristics within the meaning of Article 8 of the SFDR. As a result, we are updating the Hong Kong offering documents (including Product Key Facts Statements) of GSF to include new disclosures in the Fund's investment policy and additional information on its approach to sustainability and ESG considerations, which will be set out in a new section in Appendix 3: Sustainability Disclosures of the Prospectus. Such updates are elaborations of the investment processes that the Investment Manager are currently using which are within the parameters of the Fund's current investment objectives and policy. **For the avoidance of doubt, the Fund will not be classified as an environmental, social and governance fund in Hong Kong.**

The categorisation and related disclosures reflect and clarify how the Fund is currently being managed and does not affect its risk or return profiles.

The updates to the Fund's investment policy and the additional information on the Fund's approach to sustainability and ESG considerations neither changes the Investment Manager's investment philosophy and investment process nor is expected to alter the risk or return profile of the Fund. There will be no change in the operation and manner in which the Fund is managed and no adverse effect on existing investors, including no matters/impacts arising that may materially prejudice the existing investors' rights or interests.

For more information on the approach of the Fund and the environmental and social characteristics promoted, please see the Appendix to this letter.

Other changes to the investment objective and policy of the Fund

We are also making other changes which do not relate to ESG or sustainability. These include, amongst other changes, clarifying the investment objective of the Fund and updating the wording of the Fund's investment objective and policy to be more in line with current expectations. These changes are also set out in the Appendix to this letter.

Again, these changes neither changes the Investment Manager's investment philosophy and investment process nor is expected to alter its risk or return profile of the Fund. There will be no change in the operation and manner in which the Funds are managed and no adverse effect on existing investors, including no matters/impacts arising that may materially prejudice the existing investors' rights or interests.

For the avoidance of doubt, there will be no change to the net derivative exposure of the Fund and the Fund's net derivative exposure will remain as up to 50% of its net asset value.

When will the changes become effective?

We are required to give you at least one month's notice of the changes to the investment objective and policy of the Fund. Therefore, these will be effective from 30 November 2022.

If you are not happy with the changes, you may switch your investment into another SFC authorized² sub-fund within the GSF range or redeem your investment. If you wish to switch or redeem prior to the effective date, instructions must be received by 5:00 p.m. Hong Kong time on 29 November 2022, but please note that if you deal through an intermediary they may have a different cut off time. You will not be charged for any such switch or redemption by the GSF or Ninety One Group but your bank, distributor or financial advisor may charge you switching and/or transaction fees. You are advised to contact your bank, distributor or financial advisor should you have any questions.

Fund document updates

We will update the Hong Kong offering documents (including Product Key Facts Statements) of GSF to reflect the changes described in this letter accordingly.

Revised copies of the Hong Kong offering documents (including Product Key Facts Statements) will be available on our website, www.ninetyone.com/hk³, and on request at the postal address or email address appearing in this letter, free of charge.

Fees and costs

The updates and changes have not resulted in any change to the current level of management fees or other fees charged. The costs associated with implementing the updates and changes, such as legal and administrative costs, are included under the "Operating and Administrative Expenses" as set out in Section 9.8 of GSF's Prospectus. The Management Company and the Board of Directors of GSF will allocate these operating and administrative expenses across the range of GSF funds on a fair and equitable basis. The Fund's contribution is estimated to be approximately US\$252, which is equivalent to 0.00004% of its net asset value (as at 3 October 2022). The above arrangements are not prejudicial to the shareholders of other GSF's sub-funds.

ISIN codes

The ISIN code for each share class of the Fund affected by the changes is shown below. These codes will remain unchanged.

Share Class	ISIN Code
European Equity Fund, A, Acc, EUR	LU0440694585
European Equity Fund, A, Acc, USD	LU0345777147
European Equity Fund, A, Acc, USD, Hedged (Portfolio - AC)	LU1078025761
European Equity Fund, A, Inc, EUR ⁴	LU1194089030
European Equity Fund, A, Inc, USD	LU0345777659
European Equity Fund, C, Acc, EUR ⁴	LU1251922974
European Equity Fund, C, Acc, USD ⁴	LU0983163964
European Equity Fund, C, Acc, USD, Hedged (Portfolio - AC) ⁴	LU1078026066

² SFC authorization is not a recommendation or endorsement of a product nor does it guarantee the commercial merits of a product or its performance. It does not mean the product is suitable for all investors nor is it an endorsement of its suitability for any particular investor or class of investors.

³ The website has not been reviewed by the SFC.

⁴ These share classes are not available to the public of Hong Kong.

Share Class	ISIN Code
European Equity Fund, C, Inc, USD	LU0345777733
European Equity Fund, I, Acc, EUR ⁴	LU0386383433
European Equity Fund, I, Acc, USD ⁴	LU0439321364
European Equity Fund, I, Acc, USD, Hedged (Portfolio - AC) ⁴	LU1097476706
European Equity Fund, I, Inc, EUR ⁴	LU1308393989
European Equity Fund, IX, Acc, EUR ⁴	LU1745457587
European Equity Fund, J, Acc, EUR ⁴	LU1676113621
European Equity Fund, S, Acc, USD ⁴	LU0869877836

More information

If you would like further information regarding the content of this letter, please contact your usual financial and/or tax advisor in the first instance. Alternatively, our teams are available to help you. Please find their contact details on the first page of this letter. For more information on our funds, please visit our website, www.ninetyone.com/hk³.

Thank you for your continued investment.

Yours faithfully,



Grant Cameron
Director



Matthew Francis
Director

The Management Company and the Directors of GSF are responsible for the accuracy of the contents of this letter. To the best of the knowledge and belief of the Management Company and the Directors of GSF (who have taken all reasonable care to ensure that such is the case) the information contained in this letter is in accordance with the facts and does not omit anything likely to affect the import of such information. The Management Company and the Directors of GSF accept responsibility accordingly.

All defined terms in this letter shall have the same meaning as those defined terms as set out in the Prospectus of GSF, unless the context requires otherwise.

APPENDIX

European Equity Fund

Approach to sustainability

The environmental and social characteristics promoted by the Fund will be set out in its investment objective and policy and in a new section in Appendix 3: Sustainability Disclosures of the Prospectus. For further details, please see the section called 'Revised investment objective and policy and sustainability disclosure' below.

Other changes to the investment objective and policy

We are clarifying the investment objective of the Fund. Currently, the Fund aims to provide long-term capital growth in its investment objective. While the Fund continues to prioritise long-term capital growth (i.e. to grow the value of your investment), it will also provide the opportunity for income. We are, therefore, reflecting this in the Fund's investment objective.

The Fund (which is an equity fund) states long-term capital growth as its investment objective.

However, as with a typical equity fund, the returns derived from the equities in which the Fund invests could come from both capital growth (i.e. the price appreciation of shares that the Fund invest in) or income (i.e. when an investee company pays a dividend). The Fund has historically invested in companies where returns could be derived from both these sources (price appreciation and dividend income).

In order to provide investors a clearer depiction of the Fund's return, we are taking this opportunity to update the disclosures of the investment objective of the Fund. As such, we are reflecting this in the Fund's investment objective and policy by clarifying in the investment objective of the Fund that the Fund will also provide the opportunity for income.

We are also making amendments to the investment objective and policy of the Fund to update the current wording to be more in line with current expectations for investment objectives and policies. For example, we are enhancing the wording on the types of derivatives the Fund may use as well as describing that cash is held on an ancillary basis. We believe that these changes make the Fund's aims, and the type of investments it may invest in, clearer.

For the avoidance of doubt, there will be no change to the net derivative exposure of the Fund and the Fund's net derivative exposure will remain as up to 50% of its net asset value.

Revised investment objective and policy and sustainability disclosure

The amendments to the investment objective and policy of the Fund are set out in the table below. For ease of reference, we have extracted and put the current and new wording side-by-side, crossed through the deletions and underlined the paragraphs that have changed so that it is easier for you to compare.

These changes neither changes the Investment Manager's investment philosophy and investment process nor is expected to alter the risk or return profile of the Fund. There will be no change in the operation and manner in which the Fund is managed and no adverse effect on existing investors, including no matters/impacts arising that may materially prejudice the existing investors' rights or interests.

Current investment objective and policy

The Sub-Fund aims to achieve long-term capital growth primarily through investment in companies either listed and/or domiciled in Europe, or established outside of Europe but carrying out a significant portion of their business activities in Europe.

The Sub-Fund may use derivatives for the purposes of hedging and/or efficient portfolio management.

New investment objective and policy

The Sub-Fund aims to achieve long-term provide capital growth (i.e., to grow the value of your investment) with the opportunity for income over the long-term.

The Sub-Fund invests primarily through investment in equities (e.g. shares) of companies either listed and/or domiciled in Europe, or established outside of Europe but carrying out a significant portion of their business activities in Europe.

The Sub-Fund will be actively managed. The Investment Manager will have full discretion in its choice of companies either by size or industry.

Investment opportunities are identified using in-depth analysis and research on individual companies.

The Sub-Fund promotes environmental and social characteristics in line with Article 8 of the SFDR as described in the Sub-Fund's Sustainability Disclosures.

The Sub-Fund will not invest in certain sectors or investments. Details of these excluded areas can be found on the website www.ninetyone.com/hk in a section entitled "Sustainability-related Disclosures pursuant to Article 10 of the SFDR." Over time, the Investment Manager may, in its discretion and in accordance with the Sub-Fund's investment objective and policy, elect to apply additional exclusions to be disclosed on the website, as they are implemented.

The Sub-Fund may also invest less than 30% of its net asset value in other transferable securities, money market instruments, derivatives (financial contracts whose value is linked to the price of an underlying asset), deposits and units or shares in other funds. The Sub-Fund may hold Cash on an ancillary basis.

The Sub-Fund may use derivatives for the purposes of hedging and/or efficient portfolio management. Derivatives which may be used include, without being exhaustive, exchange traded and over-the-counter futures, options, swaps, and forwards. The underlying of a transaction in a derivative may consist of any one or more of transferable securities, indices, foreign exchange rates and currencies.

Sustainability disclosure

A summarised version of the environmental characteristics promoted by the Fund and the investment strategy used to do this is described below. Full details will be found in the Fund's sustainability disclosures in Appendix 3 of the revised Prospectus accordingly.

The Fund promotes environmental characteristics by maintaining a portfolio that in aggregate has a lower blended environmental intensity compared with its benchmark. The Fund does this by making investments in companies that meet the standards of the Investment Manager's proprietary sustainability assessments and by excluding investments in certain sectors or business areas.

'Blended environmental intensity' is a proprietary metric representing an equally weighted combination of Scope 1 and Scope 2 greenhouse gas emissions intensity, landfill waste intensity, and water usage intensity.

The Investment Manager's proprietary sustainability assessments use the following frameworks to determine whether investee companies meet the standards required by the Investment Manager. This analysis uses a variety of qualitative information and available data.

1. Sector Sustainability Frameworks

These frameworks aim to identify key sustainability issues across three pillars (i) efficient utilisation of resources, (ii) social license to operate, and (iii) governance, determine their materiality, establish measurement metrics and prioritise sustainability-related engagement with companies.

2. Carbon Scorecard

The carbon scorecard aims to monitor the path towards net zero of high portfolio emitters. It provides an engagement roadmap to encourage companies on their journey (from disclosure to setting emission targets, through to net zero alignment).

The Fund will not invest in companies that derive more than 5% of their revenue from the following business activities:

- thermal coal extraction or power generation;
- the production of crude oil from oil sands;
- the manufacture and sale of tobacco products; or
- the management or ownership of adult entertainment production or distribution.

Furthermore, the Fund will not invest in companies that:

- are directly involved in the manufacture and production of controversial weapons (including biological and chemical weapons, cluster munitions, and landmines);
- are directly involved in the manufacture and production of nuclear weapons; or
- the Investment Manager deems to be in violation of global norms, in particular the UN's Global Compact principles, based on a qualitative assessment of companies that are identified using third party data sources.

