

IMPORTANT: This letter is important and requires your immediate attention. If you have any questions about the contents of this letter, please seek independent professional advice.

30 October 2017

Dear Investor,

JPMorgan India Smaller Companies Fund (the “Fund”)

We are writing to inform you about the Indian tax provisioning arrangement of the Fund.

Reference is made to the Explanatory Memorandum of the Fund, in which it is stated that (i) the Fund obtains a certificate of tax residency (“TRC”) from the Mauritius Revenue Authority, and (ii) due to the Fund’s Mauritius tax residence status, pursuant to the India-Mauritius tax treaty, the Fund expects that no Indian tax will be payable in respect of any capital gains realised on its Indian securities.

The Fund is required to annually renew the TRC to evidence its Mauritius tax residence status. The renewal of the last TRC has been applied for by the Fund. However, as at the date of this letter, a renewed TRC has not yet been issued by the Mauritius Revenue Authority. Due to this uncertainty in obtaining the TRC, the manager of the Fund (the “Manager”), based on professional tax advice and having discussed this matter with the Fund’s auditor and trustee, has decided to make a provision for 100% of the Fund’s potential Indian tax at the rate of approximately 17.77% on all realized and unrealized short-term gains (i.e., gains on securities held for less than one year) of Indian securities after 20 August 2017, i.e., the date of expiration of the last TRC, with effect from 26 September 2017. As a result, the total Indian tax provision for unrealized short-term gains on Indian securities as at 26 September 2017 amounted to 0.25% of the Fund’s net asset value. This amount is likely to change daily and may increase or decrease depending on sale activities, market movements and length of holding of Indian securities in the Fund’s portfolio.

The change in the tax provisioning basis of the Fund was implemented to reflect the likelihood of the Fund’s inability to claim the benefit under the India-Mauritius tax treaty due to the Mauritius Revenue Authority’s delay in issuing the renewed TRC. Provisioning for such tax obligation will put the Fund in a better position to meet the anticipated imposition of tax by the Indian government should such unrealized short-term gains become realized before issuance of the renewed TRC. This is considered to be in the best interest of the Fund and its investors and would not materially prejudice the interests of the investors.

The Manager will continue to closely monitor the situation and will further update all relevant investors if there is a significant change in the Indian tax provisioning arrangement in the Fund’s portfolio. In the event that any part of the tax provision is no longer required based on professional tax advice, it will be released back into the Fund. Any shortfall between the provision and the actual tax liabilities, which will be debited from the Fund’s assets, will adversely affect the Fund’s net asset value. Conversely, the actual tax liabilities may be lower than the tax provision made. Consequently, depending upon the final outcome of the issuance of the Fund’s renewed TRC and the timing of investors’ subscriptions and/or redemptions of their units in/from the Fund, as the tax

provision may not relate directly to the period in which investors hold their investment, investors may be disadvantaged as a result of any shortfall of tax provision and, in the case of overprovision, they will not have the right to claim any part of such overprovision. Investors should seek their own tax advice on their tax position with regard to their investment in the Fund.

The Manager accepts responsibility for the accuracy of the contents of this letter.

If you have any questions with regard to the contents of this letter or any other aspect of the Fund, please do not hesitate to contact:

- your bank or financial adviser;
- your designated client adviser, account manager, pension scheme trustee or administrator;
- our Intermediary Hotline on (852) 2978 7788;
- our Intermediary Clients' Hotline on (852) 2265 1000; or
- if you normally deal directly with us, our J.P. Morgan Funds InvestorLine on (852) 2265 1188.

Yours faithfully,
For and on behalf of
JPMorgan Funds (Asia) Limited

A handwritten signature in black ink, appearing to read 'Edwin TK Chan', with a stylized flourish at the end.

Edwin TK Chan
Director

重要資料：務請即時細閱本重要函件。如閣下對本函件的內容有任何疑問，應尋求獨立專業意見。

敬啟者：

摩根印度小型企業基金（「本基金」）

此函旨在告知閣下有關本基金的印度稅項撥備安排。

謹此提述本基金的基金說明書內列明：(i) 本基金獲毛里求斯稅務局發出稅務駐在地證書（「稅務駐在地證書」）；以及(ii) 由於本基金擁有毛里求斯居民身份，根據印度－毛里求斯稅務條約，預期本基金毋須就其印度證券之任何實現資本增值繳納印度稅項。

本基金須每年為稅務駐在地證書續期，以證明其毛里求斯居民的身份。本基金已向當局申請為稅務駐在地證書續期。然而，截至本函件日期，毛里求斯稅務局尚未向本基金發出續期稅務駐在地證書。由於未能確定是否取得稅務駐在地證書，本基金的經理人（「經理人」）根據專業稅務意見及與本基金的核數師及信託管理人商討後，已決定自2017年9月26日起，就本基金於2017年8月20日（即去年的稅務駐在地證書的屆滿日期）後來自印度證券的全部實現及未實現短期增值（即持有少於一年的證券之增值）之潛在印度稅項，按大約17.77%稅率作出100%撥備。因此，於2017年9月26日就印度證券之未實現短期增值作出的印度稅項撥備總額佔本基金資產淨值的0.25%。此金額可能會每日變動，並會視乎本基金之投資組合中的印度證券的銷售活動、市場變動及持有期而增加或減少。

本基金更改稅項撥備基準乃為了反映本基金有可能因毛里求斯稅務局延遲發出續期稅務駐在地證書而無法受惠於印度－毛里求斯稅務條約下之稅務優惠。倘若該等未實現短期增值於發出續期稅務駐在地證書前已實現，則已就該等稅項負擔作出之撥備將有助本基金應付預期印度政府可能徵收的稅項。此舉符合本基金及其投資者的最佳利益，並不會對投資者的利益造成重大損害。

倘若本基金之投資組合的印度稅項撥備安排出現重大變更，經理人將繼續密切留意情況，並向所有相關投資者提供進一步最新資料。倘若根據專業稅務意見毋須再作出任何部分的稅項撥備，會將有關金額撥回予本基金。任何因撥備少於實際稅項負擔而造成之短缺將於本基金的資產中扣除，對本基金之資產淨值將造成不利影響。相反，實際稅項負擔可能少於所作的稅項撥備。因此，視乎本基金獲發續期稅務駐在地證書之最終結果及投資者認購及／或贖回本基金的單位之時間（因為該稅項撥備或不直接與投資者持有投資的期間相關），投資者可能因任何稅項撥備不足而受到不利影響，以及在超額撥備的情況下，投資者將無權要求獲得該超額撥備之任何部份。投資者應就有關其於本基金之投資而自行徵詢關於其本身稅務狀況之稅務意見。

經理人就本函件內容之準確性承擔責任。

如閣下對本函件的內容或本基金任何其他方面有任何疑問，請聯絡：

- 閣下的銀行或財務顧問；
- 閣下指定的客戶顧問、客戶經理、退休金計劃受託人或行政管理人；
- 本公司的機構代理服務熱線（852）2978 7788；
- 本公司的代理客戶服務熱線（852）2265 1000；或
- 如閣下通常直接與我們聯絡，請致電摩根基金理財專線（852）2265 1188。

摩根基金（亞洲）有限公司



董事
陳俊祺
謹啟

2017年10月30日