COUNTRY SUPPLEMENT - SWEDEN

E.I. STURDZA FUNDS PLC (THE "COMPANY")

This Country Supplement forms part of, and should be read in the context of, and in conjunction with, the prospectus for the Company dated 29th November 2018, as supplemented from time to time, (hereinafter together referred to as the "Prospectus").

The Directors of the Company, whose names appear in the Prospectus under the heading "Management of the Fund", accept responsibility for the information contained in this document. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

All capitalised terms contained herein shall have the same meaning in this Country Supplement as in the Prospectus unless otherwise indicated.

The Directors wish to inform Shareholders and prospective investors in the Company or its Funds of the following:

ADDITIONAL INFORMATION FOR INVESTORS IN SWEDEN

This section contains information specific to Swedish investors regarding the Company. It forms part of and must be read in conjunction with the Prospectus and the Supplements. All capitalised terms herein contained shall have the same meaning in this supplement as in the Prospectus, unless otherwise indicated.

Pursuant to Chapter 1 Section 7 of the Swedish Investment Fund Act 2004 (*lag (2004:46) om värdepappersfonder*) (the "IFA"), the Company has notified the Swedish Financial Supervisory Authority (*Finansinspektionen*) of its intention to offer shares of the following Funds of the Company for sale to the public in Sweden and has been granted the authorisation to do so.

- Strategic China Panda Fund
- Nippon Growth (UCITS) Fund
- Strategic Europe Value Fund
- Strategic Bond Opportunities Fund
- Sturdza Family Fund

Appointment of Swedish Paying Agent

Skandinaviska Enskilda Banken AB (publ)

Transaction Banking

SEB Merchant Banking

Kungsträdgårdsgatan 8

SE-106 40 Stockholm,

Sweden.

(The "Swedish Paying Agent") has been appointed by the Company as its paying and information

agent in Sweden pursuant to Chapter 1 Section 7 of the IFA.

Applications for redemption or conversion of shares can be lodged with the Swedish Paying

Agent and redemption payouts as well as dividends and other payments can be made through

the Swedish Paying Agent.

The Prospectus, the Key Investor Information Document, the Memorandum and Articles of

Association of the Company, the most recent annual report and, if subsequently published, the

last semi-annual report, may be obtained free of charge from the Swedish Paying Agent or can

be inspected at the offices of the Swedish Paying Agent during normal business hours.

The Funds' offer and redemption prices are available on the website www.eisturdza.com.

Notifications to Shareholders as and when necessary will be available on the website.

DATED: 21 December 2018