

INFORMATION MEMORANDUM FOR INVESTORS IN SINGAPORE

relating to
STRATEGIC EUROPE QUALITY FUND AND STRATEGIC CHINA PANDA FUND (the "Funds"),
sub-funds of **E.I. STURDZA FUNDS PLC** (the "Company")

This Information Memorandum forms part of and should be read in conjunction with the Prospectus for E.I. Sturdza Funds, plc (the "Company") dated 29th November 2018, which includes the Supplements for the Strategic China Panda Fund, the Strategic Euro Bond Fund, the Nippon Growth (UCITS) Fund, the Strategic Global Bond Fund, the Strategic US Momentum and Value Fund, the Strategic Global Quality Fund, the Strategic European Smaller Companies Fund, the Strategic Quality Emerging Bond Fund, the Strategic Beta Flex Fund, the Strategic Bond Opportunities Fund and the Strategic Japan Opportunities Fund each of which is dated 29th November 2018, the Supplement for the Sturdza Family Fund dated 14 February 2019 as well as the Supplement for Strategic Europe Quality Fund dated 26 July 2019, and the First Addendum dated 15 January 2020 (collectively the "Prospectus" as same may be amended from time to time).

All capitalised terms contained herein shall have the same meaning in this Information Memorandum as in the Prospectus unless otherwise indicated. Further, this Information Memorandum should be read in conjunction with the Key Investor Information Documents and the latest available annual and semi-annual report relating to Shares in the Fund.

Important information for Singapore investors

The Funds are not authorized or recognized by the Monetary Authority of Singapore ("MAS") and shares in the scheme are not allowed to be offered to the retail public. This Information Memorandum is not a prospectus as defined in the Securities and Futures Act, Chapter 289 of Singapore (the "Act"). Accordingly, statutory liability under the Act in relation to the content of prospectuses does not apply. MAS assumes no responsibility for the contents of this Information Memorandum.

No offer of the shares in the Funds ("Shares") for subscription or purchase, or invitation to subscribe for or purchase the Shares, may be made, nor any document or other material (including but not limited to this Information Memorandum) relating to the Shares may be circulated or distributed, either directly or indirectly, to any person in Singapore other than to: (i) "institutional investors" pursuant to Section 304 of the Act, (ii) "relevant persons" pursuant to section 305(1) of the Act, (iii) any person pursuant to Section 305(2) of the Act, or (iv) otherwise pursuant to, and in accordance with the conditions of, other applicable provisions of the Act.

The offer, holding and subsequent transfer of Shares are subject to restrictions and conditions under the Act. You should consider carefully whether the investment is suitable for you and consult your legal or professional advisor if in doubt.

The Funds

The Funds are sub-funds of the Company which is an open-ended umbrella investment company with variable capital and segregated liability between sub-funds incorporated with limited liability in Ireland under the Companies Act 2014 with registration number 461518 and established as an undertaking for collective investment in transferable securities pursuant to the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations, 2011 (S.I. No. 352 of 2011).

The Funds are also granted restricted status under paragraph 3 of the Sixth Schedule to the Securities and Futures (Offers of Investments) (Collective Investment Schemes) Regulations by MAS, which can be contacted at 10 Shenton Way, MAS Building, Singapore 079117.

The Investment Manager

Pursuant to an Investment Management Agreement entered into between the Company and E.I. Sturdza Strategic Management Limited (the "Investment Manager"), the Investment Manager was appointed to act as the investment manager of the Funds. The Investment Manager will be

responsible on a day-to-day basis for providing marketing and investment management services in respect of the Funds with the possibility to delegate part or all of such functions to third parties.

The Investment Manager is regulated and licensed by the Guernsey Financial Services Commission to provide investment management and advisory services.

The Depositary

Under the terms of the Depositary Agreement, BNY Mellon Trust Company (Ireland) Limited has been appointed as the Depositary of the Funds.

BNY Mellon Trust Company (Ireland) Limited is a private limited liability company incorporated in Ireland on 13th October 1994. The principal activity of the Depositary is to act as the custodian and trustee of the assets of collective investment schemes. The Depositary is authorised by the Central Bank under the Investment Intermediaries Act, 1995.

Information on Regulators

Regulator of the Company and the Funds:

Central Bank of Ireland
Funds Authorisation
Securities and Markets Supervision Division
Block D, Iveagh Court
Harcourt Road
Dublin 2
Tel: +353 1 224 6000
Fax: +353 1 671 6561

Regulator of the Investment Manager:

Guernsey Financial Services Commission
P.O. Box 128
Gategny Court
Gategny Esplanade
St Peter Port
Guernsey
GY1 3HQ
+44 1481 712706 / 712801

Other Information

Please note that this Information Memorandum is intended to accompany the Prospectus and Key Investor Information Documents. Investors should refer to the Prospectus and Key Investor Information Documents for particulars on (i) the investment objective, focus and approach of the Fund, (ii) the risks of subscribing for or purchasing the Shares in the Fund, (iii) the conditions, limits and gating structures for redemption of the Shares, and (iv) the fees and charges that are payable by investors and payable out of the Funds.

The Investment Manager has no specific policy regarding side letters that may further qualify the relationship between the Funds and selected investors. The Investment Manager intends to always act in accordance with the principle of equal treatment to all investors.

Information on the past performance of each Fund may be obtained from the website: <https://www.ericsturdza.com>. Choose "The Funds", and select "Strategic Europe Quality Fund" or "Strategic China Panda Fund". Annual reports approved by the auditors and semi-annual reports are available upon request to shareholders at the registered office of the Investment Manager.

This Information Memorandum is not and should not be construed as making an offer in Singapore of Shares in any other sub-funds mentioned in the Prospectus and Key Investor Information Documents.

Dated 27 February 2020