

**E.I. STURDZA FUNDS PLC (THE “COMPANY”)
INFORMATION FOR INVESTORS IN SWITZERLAND**

REPRESENTATION AND DISTRIBUTION IN SWITZERLAND

This Country Supplement forms part of, amends the table of contents to specifically reference the Country Supplement, and should be read in conjunction with the prospectus for the Company dated 26th November 2020 (the “Prospectus”). This Country Supplement provides an overview of the marketing arrangements and main terms and conditions applicable to investment into shares in the Company by prospective investors in Switzerland. The overview is intended for Shareholders and potential investors of the Company in Switzerland only.

1. Distribution in Switzerland

For the Shares distributed in and from Switzerland, the Prospectus which is binding is the version in French.

2. Representative and service of payment in Switzerland

The Company has appointed Banque Eric Sturdza SA, 112 rue du Rhône 1211 Geneva 3, as representative and paying agent for the Company in Switzerland (the “Representative”).

For the Shares distributed in or from Switzerland, the service of payment, place of performance and jurisdiction are located at the Representative’s registered office.

The Articles of Association of the Company, the Prospectus, the Key Investor Information Documents, the annual and semi-annual reports of the Company can be obtained, free of charge, from the Representative.

3. Publications

Publications of the Company in Switzerland will be in “Swiss Fund Data AG”.

4. Publication of the issuing and redemption prices

Issuing and redemption prices of the Shares, jointly, respectively the Net Asset Value of the Shares with the mention “commissions not included” of all Share Classes will be published daily in “Swiss Fund Data AG”.

5. Retrocessions and Commissions

The Company will not pay retrocessions and/or commissions to any type of investor or distributor or partner of distribution except distributors' fees, paid as an initial one off sales charge on subscription monies, details of which are set out in the Prospectus and relevant Supplement for each Fund of the Company.

6. Marketing and distribution by E.I. Sturdza Strategic Management Limited (the "Investment Manager")

The Investment Manager can use part of its fee income to pay retrocessions and rebates to investors and/or distributors, who qualify as such, pursuant to the Swiss Funds and Asset Management Association Transparency Guidelines of 22 May, 2014 outlining duties regarding the charging and use of fees and costs.

- a) Accordingly, retrocessions may only be paid to the distributors or partners of distribution designated hereunder in respect of the distribution services provided to the Investment Manager on behalf of the fund:
- authorised distributors;
 - distributors exempted from such authorisation (banks, securities dealers, insurances, managing companies of collective investment vehicles);
 - partners of distribution who place the shares exclusively with their clients on the basis of a written discretionary/advisory mandate (asset managers).

The recipients of the retrocessions must ensure transparent disclosure and inform investors, unsolicited and free of charge, about the amount of remuneration they may receive for distribution.

On request, the recipients of retrocessions must disclose the amounts they actually received for distributing the collective investments schemes to the investors concerned.

Retrocessions are not deemed to be rebates even if they are ultimately passed on, in full or in part, to the investors.

- b) In addition, the Investment Manager can use part of its fee income to pay rebates to any investor for the purposes of reducing the fees applied to that investor in respect of their investment in the fund. However, in order to qualify for a rebate in relation to their investment, the investor will need to satisfy the following objective criteria as determined by the Investment Manager:
- (i) The investor is invested in the Standard or Retail Classes (not the Institutional or Super Institutional Share Classes) where different rebate rates will be applied dependent upon the following factors:

- a. An investor invests a minimum of USD 3 million, or its equivalent in other currency, in a Fund which forms part of the Company's umbrella structure as detailed in the Company's Prospectus; or
 - b) An investor invests a minimum of USD 5 million, or its equivalent in other currency, in a Fund within six months of its launch to provide support during the launch phase; or
 - c) An investor invests a minimum of USD 5 million, or its equivalent in other currency, in a Fund with total assets below USD 100 million.
- (ii) No rebates are paid on Institutional or Super Institutional Share Classes.
- (iii) No performance fee rebates will be paid.

The Investment Manager will further disclose, free of charge, the objective criteria and the corresponding amounts in relation to the payment of rebates upon request from investors in a Fund and will extend similar terms in relation to the payment of rebates to all investors in a Fund that meet the objective criteria outlined above upon request.

7. Automatic Exchange of Information in Tax Matters

The Agreement between Switzerland and EU for automatic exchange of information in tax matters which entered into force on January 1st, 2017 is a protocol of amendment to replace the taxation of savings agreement between Switzerland and the EU that has been in force since 2005, but it includes the existing withholding tax exemption for cross-border payments of dividends, interest and royalties between related entities (Art. 9).

Dated: 17 December 2020