E.I. STURDZA FUNDS PLC
FIRST ADDENDUM TO PROSPECTUS

This Addendum forms part of and should be read in the context of and in conjunction with the Prospectus for the Company dated 26 November, 2020 ("Prospectus") and is incorporated herein. All capitalised terms herein contained shall have the same meaning in this Addendum as in the Prospectus unless otherwise indicated.

The attention of investors is drawn to the "Risk Factors" section in the Section of the Prospectus entitled "The Company".

The Directors of the Company whose names appear under the heading "Management and Administration" in the Prospectus accept responsibility for the information contained in this Addendum. 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 Addendum is in accordance with the facts and does not omit anything likely to affect the import of such information. The Directors accept responsibility accordingly.

The Directors wish to advise Shareholders of the following updates to the Prospectus.

1. Sustainability Risk

The section of the Prospectus entitled "**Risk Factors**", shall be updated to include the below additional risk factor:

"Sustainability Risk

The aim of the Sustainable Finance Disclosure Regulation ("**SFDR**") is to provide transparency on sustainability within the financial markets in a standardised manner. Sustainability risk is defined under the SDFR as "an environmental, social or governance event or condition that, if occurs, could cause an actual or potential material negative impact on the value of the investment." Sustainability risks, if not managed appropriately, may hinder the Funds ability to achieve their objectives. The Investment Manager ensures that sustainability risks are integrated into the investment management processes of the Funds and conducts ongoing oversight procedures.

Measures are taken by the Investment Manager and the appointed Investment Advisers to reduce sustainability risk across the Funds. However, they remain exposed to losses arising from environmental, governance and social incidents.

Environmental incidents could arise from operational accidents that could cause environmental damage resulting in significant financial distress and liabilities for environmental clean-up, restoration costs, claims made by neighbouring landowners and other third parties for personal injury and property damage, and fines or penalties for related violations of environmental laws or regulations.

The Funds may not be able to recover these costs from insurance. Failure to comply with environmental laws and regulations may trigger a variety of administrative, civil and criminal enforcement measures, including the assessment of monetary penalties, the imposition of remedial requirements and the issuance of orders restricting future operations. Voluntary or regulatory environmental standards are gradually being implemented in a number of countries to reduce greenhouse emissions believed to contribute to climate change. Adoption of these standards may increase costs in some companies the Funds invest in and therefore impact their share price.

The Investment Manager and the appointed Investment Advisers also determine the nature and extent of the risks that companies are taking with their corporate governance. Breaches of corporate governance can lead to significant losses and impact on the value of the Funds' investments.

Social risk may arise following events that give rise to a negative perception of an organization's impact on the community. The social risks will depend on the nature and scale of a company's operations, the industry sector and the geographic context. Social risks may include events that lead to environmental pollution, hazards to human health, safety and security, remuneration bias and threats to a region's biodiversity and cultural heritage. These events can result in significant investment losses.

The Investment Manager and the appointed Investment Advisers will consider environmental, governance and social factors before making an investment. Monitoring of environmental, governance and social risks will be undertaken on an ongoing basis after investments are made. There can be no assurance, however, that such due diligence and ongoing monitoring will reveal all environmental, governance and social liabilities and risks relating to an investment.

The Investment Manager has determined that the sustainability risk (being the risk that the value of a Fund could be materially negatively impacted by an ESG event) faced by the Funds is moderate."

2. Principal Adverse Impact Reporting

The Prospectus of the Company, specifically the section headed "**THE COMPANY**" shall be updated to include an additional sub-section headed "**Principal Adverse Impact Reporting**", which shall appear immediately after the sub-section headed "**Risk Factors**":

"**Principal Adverse Impact Reporting**

"As permitted under Article 4 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (the "SFDR"), the Company does not consider adverse impacts of investment decisions on sustainability factors on the basis that it is not a financial market participant that is required to do so given that the Company does not have on its balance sheet an average number of employees exceeding 500 during the financial year. The Company may choose at a later date to publish, and maintain on the website of the Investment Manager, the consideration of principal adverse impacts of investment decisions on sustainability factors."

Dated: 9th March, 2021