

THIS DOCUMENT IS IMPORTANT AND REQUIRES YOUR IMMEDIATE ATTENTION. IF YOU DO NOT UNDERSTAND IT OR ARE IN DOUBT AS TO THE ACTION TO BE TAKEN PLEASE CONSULT YOUR STOCKBROKER, ACCOUNTANT, SOLICITOR, FINANCIAL ADVISER OR WEALTH MANAGER IMMEDIATELY.

26 July 2023

Dear Investor,

## <u>Change to the investment objective and investment policy for AXA Framlington Global Sustainable Managed Fund</u> (the "Fund") a sub-fund of the AXA Framlington Range of Authorised Unit Trust Schemes.

We, AXA Investment Managers UK Limited, are writing to you in our role as authorised fund manager for the Fund. The purpose of this letter is to inform you of changes to the investment objective and investment policy for the Fund which will take effect on 2 October 2023. Although **the changes do not require you to take any action** or require your approval, we recommend that you read this letter.

The Financial Conduct Authority ("**FCA**") has been notified of the changes and has confirmed that the changes will not affect the ongoing authorisation of the Fund. Under the FCA Rules, you are entitled to 60 days' advance notice of the proposed changes given that we deem these changes each to be a "significant change" within the meaning of the FCA Rules and this letter constitutes that notice.

## What is changing?

With effect from 2 October 2023, the investment objective and the investment policy of the Fund will change as explained below and described in the Appendix to this letter. The Fund's core investment philosophy<sup>1</sup>, investment process and risk profile will remain unaltered.

## How and why have we changed the investment objective of the Fund?

We have amended the investment objective (as detailed in the Appendix to this letter). As you will note, we have added a sustainability objective to the investment objective to clarify that we aim to invest in companies which have leading or improving environmental, social and governance practices, in line with the selection criteria described in the investment policy.

We have added the sustainability objective to keep the name, investment objective and investment policy consistent and to emphasise the sustainability objective as separate to the financial objective.

We believe that the financial and sustainable objectives complement each other, such that the sustainable objective assists, or at least does not work to the detriment of, the achievement of the financial objective. It is not anticipated that investors will sacrifice any financial returns by the inclusion of a separate sustainability objective.

Registered in England and Wales no 01431068. Registered office as above. Authorised and regulated by the Financial Conduct Authority and a member of the Investment Association.

<sup>1</sup> An investment philosophy of a Fund refers to the core beliefs of the Fund's manager about the performance of particular investments in the market, changes in the market and investor behaviour which guides the Fund's investment strategy.

### How and why have we changed the investment policy of the Fund?

We have amended the investment policy (as detailed in the Appendix to this letter) to add further detail on certain aspects of the investment strategy and engagement process of the Fund for greater clarity. This is part of a wider project at AXA IM to ensure that our investors are fully informed of the selection process of investments and how this supports the achievement of the investment objective of their fund. For the avoidance of doubt, please note that the investment strategy is not changing.

You will also note some more minor amendments, which have been made to achieve consistency of style between investment policies across our fund ranges where strategies are similar.

#### How can you track the performance of the Fund against its investment objectives?

The Fund's reporting can be found on the following website: <u>https://retail.axa-im.co.uk/fund-centre</u> where investors can find information on the Fund's performance against its investment objectives and its ESG, Voting and Engagement Reports.

#### What is the cost of making these changes?

We will meet the costs of amending the Fund's documentation to reflect these changes and the costs associated with notifying the Fund's shareholders. There will be no portfolio re-alignment required as a result of these changes.

#### Will these changes result in a change to the Fund's risk profile?

No, the changes described above will not result in a change to the Fund's risk profile.

#### **Further Information**

These changes will be reflected in the Fund's Key Investor Information Document (KIID) and Prospectus, which can be found on the following website: <u>https://retail.axa-im.co.uk/fund-centre</u>.

Should you have any questions about the changes being made or any other aspect of the Fund, or would like to request a copy of the KIID, please contact our Customer Services team on 0345 777 5511 (Monday to Friday 9.00am - 5.30pm) or your usual local representative.

Yours sincerely,

Marcello Arona Director

For and on behalf of AXA Investment Managers UK Limited

## Appendix

# Changes to the investment objective and the investment policy of the Fund

With effect from 2 October 2023, the investment objective for the Fund will change as follows:

CURRENT Investment Objective	NEW Investment Objective with effect from 2
	October 2023
The aim of this Fund is to provide long-term capital growth over a	The aim of this Fund is to: (i) provide long-term capital growth over
period of 5 years or more.	a period of 5 years or more; and (ii) invest in companies which have
	leading or improving environmental, social and governance (ESG)
	practices, in line with the selection criteria described in the
	investment policy.

With effect from 2 October 2023, the investment policy for the Fund will change as follows:

CURRENT Investment Policy	NEW Investment Policy with effect from 2 October 2023
The Fund invests in shares of listed companies which the Manager	The Fund invests in shares of listed companies which the Manager
believes will provide above-average returns. The Fund invests in	believes will provide above-average returns, relative to their
companies of any size and based anywhere in the world (including	industry peers. The Fund invests in companies of any size and based
emerging markets). The Manager seeks to reduce the impact on the	anywhere in the world (including emerging markets). The Manager
Fund of fluctuations in value of equity markets by investing in bonds	seeks to reduce the impact on the Fund of fluctuations in value of
issued by developed market governments. The Fund's typical asset	equity markets by investing in bonds issued by developed market
mix ranges between 60 – 85% of its Net Asset Value in shares, with	governments. The Fund's typical asset mix ranges between 60 $-$
the remainder being mainly in bonds and cash.	85% of its Net Asset Value in shares, with the remainder being
The Manager invests in issuers of shares of listed companies which	mainly in bonds and cash.
it believes have leading or improving environmental, social and	The Manager invests in issuers of shares of listed companies which
governance (ESG) practices. These companies will either	it believes have leading or improving environmental, social and
demonstrate leadership on sustainability issues (such as promoting	<del>governance (ESG) practices. These companies will </del> either
better social outcomes, increasing the amount of renewable energy	demonstrate leadership on sustainability issues (such as promoting
and using the planet's resources more sustainably and increased	better social outcomes, increasing the amount of renewable energy
digitalisation) through strong ESG practices ("leaders") or will have	and using the planet's resources more sustainably and increased
shown a clear commitment to improve their ESG practices	digitalisation) through strong ESG practices ("leaders") or <del>will</del> -have
("companies in transition"). The majority of the Fund's equity	shown a clear commitment to improve their ESG practices
investments (50% or more) will be in "leaders". The Manager will	("companies in transition"). The majority of More than 50% of the
actively engage on sustainability issues with a particular focus on	Fund's equity investments <del>(50% or more)</del> will be in "leaders". <del>The</del>
"companies in transition". When selecting shares, the Manager will	Manager will actively engage on sustainability issues with a
also analyse a company's financial status, quality of its	particular focus on "companies in transition". When selecting
management, expected profitability and prospects for growth.	shares, tThe Manager will also analyse a company's financial status,
In selecting investments (bonds and shares), the Manager will take	quality of its management, expected profitability and prospects for
into account the company's or issuer's ESG score as one factor	growth when selecting shares.
within its broader analysis of the company or issuer to identify	In selecting investments (bonds and shares), the Manager will take
investments which are expected to generate long-term capital	into account the company's or issuer's ESG score as one factor
growth. The Manager believes that companies and issuers with	within its broader analysis of the company or issuer to identify
higher or improving ESG scores manage risk associated with ESG	investments which are expected to generate long-term capital
issues more effectively, contributing to better financial	growth and which have leading or improving ESG practices. The

performance of such companies and issuers in the long term. ESG scores are obtained from our selected external provider(s) as detailed in the "Responsible Investment" section above. The "Responsible Investment" section of this prospectus contains details on our selected external provider(s). The Manager will only consider the lowest scoring companies or issuers in exceptional circumstances.

To avoid investing in companies or sovereign issuers which present excessive degrees of ESG risk, the Manager applies AXA IM Group's sector specific investment guidelines relating to responsible investment to the Fund. Such guidelines exclude investment in soft commodity derivatives or exposure to certain companies based on their involvement in specific sectors (such as unsustainable palm oil production, controversial weapons and climate risks).

The Manager also applies the AXA Investment Managers' ESG Standards policy. This policy excludes investment in companies and sovereign issuers based on: tobacco production; manufacture of white phosphorus weapons; certain criteria relating to human rights and anti-corruption as well as other ESG factors. The AXA Investment Managers' ESG Standards policy and AXA IM Group's sector specific investment guidelines are subject to change and the latest copies are accessible via the links provided in the "Responsible Investment" section of this prospectus above and are available from the Manager on request.

If the Manager deems that an investment no longer meets the criteria set out in this investment policy or its expectations in terms of that investment's prospects for achieving long-term capital growth or, in the case of a company, becomes unresponsive to the Manager's engagement efforts, the Manager will disinvest as soon as practicable having regard to the best interests of the Fund's investors and in accordance with its best execution policy.

The Fund may also invest in other transferable securities and units in collective investment schemes (including those that are managed by the Manager or its associates). The Fund may use derivatives for Efficient Portfolio Management. Use may be made of borrowing, cash holdings, hedging and other investment techniques permitted in the applicable Financial Conduct Authority rules.

The IA Mixed Investment 40-85% Shares Sector may be used by investors to compare the Fund's performance.

Manager believes that companies and issuers with higher or improving ESG scores <u>may be expected to</u> manage risk associated with ESG issues more effectively, <u>which may be expected to</u> <del>contributing <u>contribute</u> to better financial performance of such companies and issuers in the long term. ESG scores are obtained from our selected external provider(s) as detailed in the "Responsible Investment" section above. The "Responsible Investment" section of this prospectus contains details on our selected external provider(s). The Manager will only consider the lowest scoring companies or issuers in exceptional circumstances, <u>such as where it deems, through its own research, that the ESG</u> <u>score of the company or issuer does not accurately or fully reflect</u> its current ESG profile.</del>

To avoid investing in companies or sovereign issuers which present excessive degrees of ESG risk, the Manager applies AXA IM Group's sector specific investment guidelines relating to responsible investment to the Fund. Such guidelines exclude investment in soft commodity derivatives or exposure to certain companies based on their involvement in specific sectors (such as unsustainable palm oil production, controversial weapons and climate risks).

The Manager also applies the AXA Investment Managers' ESG Standards policy. This policy excludes investment in companies and sovereign-issuers based on: tobacco production; manufacture of white phosphorus weapons; certain criteria relating to human rights and anti-corruption as well as other ESG factors. The AXA Investment Managers' ESG Standards policy and AXA IM Group's sector specific investment guidelines are subject to change and the latest copies are accessible via the links provided in the "Responsible Investment" section of this prospectus above and are available from the Manager on request.

The Manager will look to engage on sustainability issues and identified areas of weakness with a selection of investee companies. The Manager will focus on companies where the continued enhancement of sustainability practices is expected to help support the robust, long-term profitability of such companies. Where weaknesses are identified, the Manager may consider the use of escalation techniques (such as voting against certain resolutions presented by management at Annual General Meetings) in certain cases. More details on the Manager's approach to sustainability and its engagement with companies are available on the website: https://www.axa-im.co.uk/ under the heading "Responsible Investing".

If the Manager deems that an investment no longer meets the criteria set out in this investment policy or its expectations in terms of that investment's prospects for achieving long term capital

growththe Fund's objective or, in the case of a company, becomes
unresponsive to the Manager's engagement efforts, the Manager
will disinvest as soon as practicable having regard to the best
interests of the Fund's investors and in accordance with its best
execution policy.
The Fund may also invest in other transferable securities, cash,
deposits, and units in collective investment schemes (including
those that are managed by the Manager or its associates) and
money market instruments. The Fund may use derivatives for
Efficient Portfolio Management. Use may be made of borrowing,
cash holdings, hedging and other investment techniques permitted
in the applicable <del>Financial Conduct Authority<u>FCA</u> rules.</del>
The IA Mixed Investment 40-85% Shares Sector may be used by
investors to compare the Fund's financial performance. The
Manager currently does not consider any available benchmarks as
a suitable performance comparator for investors to compare the
Fund's performance against its sustainability objective.