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Date: 11 April 2024

Dear Investor,

Changes to the name, the investment objective and the investment policy for AXA Framlington Managed Income Fund (the “Fund”) an authorised unit trust of the AXA Framlington Range of Authorised Unit Trusts (the “Trust”).

ISIN codes: GB00BPX35H24 (Acc GBP D); GB00BPX35J48 (Inc GBP D); GB00B5NBZ430 (Acc GBP R(G)); GB00B54CCT91 (Inc GBP R(G)); GB00B7H1PG56 (Acc GBP Z(G)); GB00B71DB365 (Inc GBP Z(G)).

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 name, the investment objective and the investment policy for the Fund which will take effect on 14 June 2024. The changes will affect all unit classes of the Fund- the ISIN codes are listed above for your reference. 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 to be “significant changes” within the meaning of the FCA Rules and this letter constitutes that notice.

What is changing?

With effect from 14 June 2024, the name, investment objective and investment policy of the Fund will change as described in the Appendix to this letter. The Fund’s core investment philosophy, investment process and risk profile will remain unaltered.

Why have we decided to change the name of the Fund?

We will be changing the name of the Fund, as detailed in the Appendix to this letter, to drop the “Framlington” brand from the name. This is part of AXA IM’s general rebranding of certain funds, which still have their historic branding. Given that the “Framlington” name is associated with our equity-based funds, and, given that the Fund’s main asset class are fixed income investments, we consider it more suitable for the Fund’s branding to be aligned with our fixed income based funds, which do not contain the “Framlington” name.

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

The original investment objective states that the aim of the Fund is to produce a “high” income return. We have amended the reference from “high” income to “an income return.” This is to remove any ambiguity as to the potential level of income which the Fund intends to achieve, given that “high” is a relative term and may imply that the income

generated is better than a benchmark or other financial instruments with similar asset allocations. We have carried through this change in the investment policy, by replacing the reference to “above-average income” to “an income return” for the same reason. Please note however that the Fund remains focussed on generating income and the level of income which the Fund aims to achieve is not changing.

We have also included the meaning of “long-term” for clarification (as detailed in the Appendix to this letter).

The financial objective remains otherwise unchanged.

How have we changed the investment policy of the Fund?

We have amended the investment policy (as detailed in the Appendix to this letter) to:

- (i) amend the minimum investment limit in bonds from 70% to 80%. The investment policy previously referred to investing “primarily” in bonds which numerically translates to 70%, per standardised definitions applied across the authorised fund’s industry;
- (ii) to introduce the use of currency hedging to the non-Sterling portion of the portfolio and therefore clarify that bonds held in the portfolio are either issued in Sterling or hedged back into Sterling;
- (iii) to clarify that bonds held in the portfolio may be corporate or government bonds, which may be investment grade or sub-investment grade (as defined in the investment policy) and that our strategy will apply to all types of bonds;
- (iv) to add further detail on the bond selection process and how the Manager mitigates risk in the portfolio;
- (v) to clarify that equity investment does not form a significant portion of the portfolio, but is a permitted investment which the Fund may invest in;
- (vi) to emphasise the existing ESG part of the investment process which we apply to all selections for the portfolio; and
- (vii) to detail our divestment policy for holdings which no longer meet the Fund’s strategy.

The remainder of the changes are to provide further clarification or detail and to align the language with other funds in the Trust.

Why have we changed the investment policy of the Fund?

(i) Change to the minimum investment limit for bonds from 70% to 80%

To meet the requirements of the IA Sterling Strategic Bond Sector (which is the financial comparator used for the Fund), the Fund needs to invest at least 80% in Sterling bonds. In practice, the Fund has historically met the IA Sector requirement despite the minimum investment level being expressed as 70%. Going forward, following a recent change in the portfolio manager for the Fund (which took effect 22nd January 2024)¹, the portfolio manager intends to invest nearly all the Fund’s assets in Sterling denominated bonds. This increase in bond investment is permissible under the current investment policy prior to the proposed changes, and as mentioned above we have historically invested in line with the IA Sector for this Fund. As such, the change to the limit will not change the way the Fund is managed. Please also note the Fund’s IA sector is also not changing.

We consider the change will better reflect the way we implement the strategy and expressly align the strategy to the sector requirement.

(ii) Use of hedging for non-Sterling bonds

The Fund may invest in corporate or sovereign issuers based globally as long as the bonds are hedged back to Sterling if they are bought in a different currency. The reason for introducing hedging to the portfolio is due to the change in the portfolio manager for the Fund (and resultant changes as part of his management style). The new portfolio

¹Details of the change of portfolio manager for the Fund can be found on our website in the ‘latest notices’ section.

manager will use currency hedging to mitigate the risk of non-sterling exposure, given his preference to invest in non-sterling denominated assets to broaden the universe of assets available to him. This is consistent with the IA Sterling Strategic Bond sector, which permits investment in non-Sterling bonds which are hedged back to Sterling. The change does not affect the risk profile of the Fund (and is in fact intended to reduce currency/ exchange rate risk).

As a consequential change, we have deleted the reference to investing mainly in UK companies. Given non-sterling bonds will now be hedged, it is no longer necessary to limit the country origin of the bonds to the UK.

(iii) Clarification that our strategy applies to all types of bonds selected for the portfolio

We have clarified that the selection strategy (including the ESG element of the investment process) applies to government as well as corporate bonds. The previous language focussed on the selection of corporate bonds (which is the main portion of the portfolio), however, the selection process and strategy applies similarly to both types of bonds.

(iv) Detail on the bond selection process

We would like to highlight that the Manager considers the relative value of a bond as part of its fundamental credit research into issuers when making selections. The relative value of a bond is a bond's value which is determined by taking into account the value of other bonds on the market (as opposed to its value in isolation). This factor has always been considered as part of the selection process for the bond, however we feel it should be emphasised as a factor given it assists the investor's understanding on how we assess value of the bonds we select.

We have also added information on how the Manager manages default risk, this being through diversification of the portfolio and through looking at particular characteristics of the bond in the selection process.

We consider the above two points as an important part of the investment strategy and so would like to expressly state these in the investment policy.

We have deleted "prospects for growth" from the list of factors that the Manager considers when making bond selections. We believe this is duplication given we already list "expected profitability" as one of the factors.

(v) Clarification regarding equity investment

We consider that it would be a better reflection of the strategy to remove the emphasis from equity investing in the policy and clarify that whilst investment in equities is permitted (under the investment policy and the IA Sector), the focus of the Fund is on bond investment.

(vi) Detail on the existing ESG criteria

As you will be aware, AXA IM have a long history in responsible investing and ESG, which are already part our investment process to enhance the traditional financial analysis. The changes we have made to the investment policy are to reflect the existing ESG element of our investment process, specifically to: (i) emphasise our use of ESG ratings to select equity and bonds; and (ii) provide further detail on our exclusion policies. Please note however that the Fund does not pursue a sustainability outcome and the Manager will only use ESG ratings as one component of its investment process.

We believe that, in today's world, issuers which address key ESG-related risks and focus on improving their practices on key ESG issues may deliver higher financial returns than the broader market over the long term.

As an active manager of your capital, it is our role to ensure that our investors are aware of the ESG element within our process for the selection of investments and how this supports the achievement of the investment objective of the Fund to generate capital growth over a period of 5 years or more.

(vii) Disinvestment policy

We consider it useful for investors to be made aware of our divestment process for investments which no longer meet the criteria outlined in the investment policy.

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 unitholders.

There are no portfolio re-alignment costs incurred as a result of the changes to the investment objective or investment policy.

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 KIID and Prospectus.

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 by phone on 0345 777 5511 (Monday to Friday 9.00am - 5.30pm) or via email on axa-im@uk.dstsystems.com. Alternatively, please contact your usual local representative.

Yours sincerely,



Marcello Arona
Director
For and on behalf of
AXA Investment Managers UK Limited

Appendix

Change to name of the Fund

With effect from 14 June 2024, the name of the Fund will change as follows:

From	To
AXA Framlington Managed Income Fund	AXA Managed Income Fund

Changes to the investment objective and policy of the Fund

With effect from 14 June 2024, the investment objective and policy for the Fund will change as follows:

CURRENT Investment Objective	NEW Investment Objective with effect from 14 June 2024
<p>The aim of this Fund is to produce a high income with potential for long-term growth of capital.</p>	<p>The aim of this Fund is to produce an income return with potential for long-term growth of capital (being a period of five years or more).</p>
CURRENT Investment Policy	NEW Investment Policy with effect from 14 June 2024
<p>The Fund invests primarily in bonds issued by companies (principally UK companies) which the Manager believes will provide above-average income. The Fund may also invest in bonds issued by governments and shares of companies. The Manager selects corporate bonds and shares based upon analysis of a company's financial status, quality of its management, expected profitability and prospects for growth.</p> <p>The Fund may also invest in other transferable securities and units in collective investment schemes. 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.</p> <p>The IA Sterling Strategic Bond Sector may be used by investors to compare the Fund's performance.</p>	<p>The Fund invests at least 80% in bonds issued in or hedged back to Sterling by companies and governments which the Manager believes will provide an income return. The Fund may invest in investment grade bonds (meaning bonds with a rating of at least BBB- by Standard & Poor or equivalent rating by Moody's or Fitch), or sub-investment grade bonds. The Manager selects bonds based upon analysis of an issuer's financial status, quality of its management expected profitability and current value relative to other bonds in the market. The Manager seeks to reduce the risk of defaults through diversification and its analysis and selection of bonds. The Fund may also invest in shares, other transferable securities (which could include unrated bonds) and units in collective investment schemes (including funds managed by the Manager and its associates). The Fund may use derivatives for Efficient Portfolio Management (such as, interest rate futures and foreign exchange swaps). Use may be made of borrowing, cash holdings, hedging and other investment techniques permitted in the applicable Financial Conduct Authority rules.</p> <p>While the Funds does not pursue a sustainability outcome, it avoids investing in bonds issued by issuers which present excessive degrees of environmental, social and governance (ESG) risk. As such, 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 issuers based on their</p>

involvement in specific sectors (such as unsustainable palm oil production, controversial weapons and climate risks).

The Manager also applies the AXA IM's ESG Standards policy. This policy excludes investment in 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 IM's ESG Standards policy and AXA IM'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.

Further, in selecting investments, the Manager will, in addition to the application of the above policies, take into account the issuer's ESG score as one factor within its broader analysis of the issuer to make selections which are expected to generate an income return over the long term. It is, however, just one component of the Manager's investment process. The Manager believes that issuers with higher ESG scores manage risk associated with ESG issues more effectively, contributing to better financial performance of such issuers in the long term. ESG scores are obtained from our selected external provider(s) and may be adjusted by the Manager using its own research. The "Responsible Investment" section of this prospectus contains details on our selected external provider(s). The Manager will not invest in bonds with the lowest ESG scores, save in exceptional circumstances, such as where it deems, through its own research, that the ESG score of the company does not accurately or fully reflect its current ESG profile.

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 the Fund's objective, 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 IA Sterling Strategic Bond Sector may be used by investors to compare the Fund's performance.