

DNCA INVEST

Société d'investissement à capital variable

Registered Office: 60, avenue J.F. Kennedy L-1855 Luxembourg, Grand-Duchy of Luxembourg,
R.C.S. Luxembourg B 125.012
(the "Fund")

NOTICE TO THE SHAREHOLDERS OF DNCA INVEST – GLOBAL NEW WORLD

Luxembourg, 30 September 2021

Dear Shareholder,

The board of directors of the Fund (the "**Board of Directors**") would like to inform you of important changes relating to the Fund's sub-fund DNCA INVEST – GLOBAL NEW WORLD (the "**Sub-Fund**").

Terms not otherwise defined in this notice will have the same meaning as those defined in the Fund's current prospectus (the "Prospectus").

The Board of Directors has decided to update as follows the investment strategy of the Sub-Fund in order to further clarify (a) the Sub-Fund's investment universe and (b) the description of the responsible investment policy as already applied by the Management Company (changes are underlined below):

"The investment strategy is based on active and discretionary management style.

The Sub-Fund promotes environmental and/or social characteristics within the meaning of Article 8 of SFDR.

The Sub-Fund considers, at least, the following objectives, and proceed to the reporting of this ESG indicators as part of the monitoring and the evolution of the portfolio's ESG performance:

- = Environment: GHG emissions, airborne pollution, waterborne pollution, water consumption, land use, etc.*
- = Social: compensation, gender inequality, health and safety, child labor, etc.*
- = Governance: corruption and bribery, tax avoidance, etc.*
- = Global ESG quality rating.*

The Sub-Fund invests at least 75% of its net assets in shares of companies occupying a position of global or local leader in their markets and operating in the technology sectors, in sectors benefiting from growing digitalization and technological innovations. ~~(example: energy transition or demographic challenges).~~

In this context, the Sub-Fund implements active conviction management using a "Quality GARP" (Quality Growth at a Reasonable Price) and SRI approach.

The Management Company selects also shares of companies that it considers as having a position of global or regional leader, offering a visibility and a sustainability of their medium to long term growth prospects.

The initial investment universe, which include ~~around~~up to 3000 global issuers, is composed of issuers ~~from~~which may belong to the MSCI All Countries World Net Return Index, as well as around 50 stocks identified by the Management Company based on the financial and extra-financial analysis, having already been invested in recent past years and ~~belonging~~which may belong to the technological index (such as NASDAQ, MSCI Information Technology, MSCI

Communication Services). The various criteria described below are applied to issuers selected within this initial investment universe.

From this initial investment universe, are excluded companies with controversies or in severe breach to UN Global Compact Principles (example: human rights or fight against corruption) based on the internal approach. Moreover, a strict controversial weapons analysis exclusion policy is implemented and is available on the website of the Management Company (<https://www.dnca-investments.com/lu/areas-of-expertise/sri> ~~https://www.dnca-investments.com/isr/Politique%20exclusion%20armements_FR-BE%2030%2010%2018.pdf~~).

Due to the responsible investment strategy, the Sub-Fund strictly excludes the following activities:

- Tobacco production;
- Controversial Weapons;
- Coal production or energy production from coal over than 10% of revenues;
- Unconventional oil and gas production over than 50% of revenues;
- Companies in severe breaches to UN Global Compact Principles.

To determine the eligible "Quality, Responsible" investment universe, at the time of purchase, the Management Company proceeds as follows:

- For each company analyzed, the Management Company assesses the quality of the business model, management and balance sheet. One scoring out of 20 summarizes the assessment of the quality Management Company of the company analyzed. Any company with a score lower than 10 is excluded from the "Quality" investment universe; and
- in order to determine their universe of responsible quality investment, the Management Company also assesses the ESG profile of the companies selected.

~~One scoring out of 20 summarizes the assessment of the ESG profile of the company analyzed. Any company with a score lower than 10 is excluded from the "Responsible Quality" investment universe.~~

The Sub-Fund integrates ESG criteria with regard to direct investments including the definition of the investment universe and the reporting for all companies.

In this way, the investment process and resulting stock picking take into account internal scoring with respect to the corporate responsibility of the companies based on an extra-financial analysis through a proprietary rating model (ABA, Above & Beyond Analysis) developed internally by the Management Company. This model is centered on four pillars as further detailed below (i) corporate responsibility, (ii) sustainable transition, (iii) controversies and (iv) dialogue and engagement with issuers.

The analysis of corporate responsibility is broken down into four aspects: shareholders responsibility, environmental responsibility, responsibility towards workers and society responsibility. Each aspect is rated independently and weighted in accordance to how material it is for the company. Each dimension is broken down into a set of criteria, which are around 25 in total. This in-depth analysis, combining qualitative and quantitative research leads to a rating out of 10.

Moreover, the monitoring of the level of controversy is taken into account directly in the corporate responsibility and may affect the rating.

~~The Sub-Fund's SRI approach revolves around the following axes: integration of the dimensions of ESG issues, exclusion of controversial issuers from the entire investment and voting right and commitment policy on securities held in the portfolio.~~

The Management Company uses a proprietary ESG analysis approach with the "best in universe" method. There may be a sector bias. The research and the ratings are conducted exclusively in-house based on corporate disclosures and our continuous dialogue with companies.

The risk exists that the models used to make these investment decisions do not perform the tasks they were designed to.

For each company, the analysis is based on quantitative and qualitative data. The quantitative data comes from a proprietary ESG pre-diagnostic tool that uses ~~external data provided by service providers as well as~~ extra-financial reports from companies. Qualitative assessment is the responsibility of Management Company and is based on factual data as well as continuous dialogue with company managers.

The model analyzes each company through environmental criteria (environmental footprint of the production chain and product life cycle or responsible supply, energy consumption and water consumption, company CO2 emissions and management of waste), social (ethics and working conditions of the production chain, treatment of employees - safety, well-being, diversity, employee representation, wages, quality of products or services sold) and governance (capital structure and protection of minority interests of shareholders, board of directors and general management, executive compensation, accounting practices and financial risks, ethical practices of the company).

The Sub-Fund is managed taking into consideration corporate responsibility and sustainable development principles in accordance with the requirements of the French SRI Label, which especially involves proceeding to the extra-financial analysis on at least 90% of the asset of the Sub-Funds and excluding at least 20% of the worst issuers of shares from its investment universe and therefore not investing in these issuers.

The result of the SRI approach will be binding on the Management Company.

The Sub-Fund may exceptionally, under extreme market conditions, use derivatives for hedging or exposure of equity and currency risk purposes."

It has also been decided to clarify that the Sub-Fund does not have recourse to securities lending, repurchase transactions and reverse repurchase transactions and therefore to remove the possibility to use these techniques from section "Description of categories of assets and financial contracts".

There will be no other changes to the Sub-Fund's investment policy. In particular, the other characteristics of the Sub-Fund remain unchanged.

The Changes will be included in the next update of the Prospectus and the KIIDs of the Sub-Fund which may be obtained free of charge upon request at the Fund's registered office at the address stated above.

Our sales team remain at your disposal should you need additional information about the Changes.

Yours faithfully,

**The Board of Directors
DNCA INVEST**