

**VONTOBEL FUND**  
Investment company with variable capital  
11–13, Boulevard de la Foire, L-1528 Luxembourg  
RCS Luxembourg B38170  
(the “Fund”)

Luxembourg, 15 November 2019

**NOTIFICATION TO SHAREHOLDERS**

The board of directors of the Fund (the “Board of Directors”) wishes to inform you of the changes to the Fund’s prospectus (the “Prospectus”) which are outlined below:

**1. Changes of the Provision Governing the Protection of Investor Information**

The provision governing the protection of information regarding the investors has been changed. The new clause extends the scope of the data recipients to the affiliates, branches, subsidiaries and parent company of the Fund’s management company and each of their respective affiliates, directors, officers or employees (this shall include without limitation Vontobel Group companies and their employees), delegates and service providers of the Fund and its management company.

Synopsis of the previous and new versions is presented in the table below:

<b>Previous terms</b>	<b>New terms</b>
<p>The Fund and/or its Management Company shall not normally divulge any confidential information concerning the Investor. The Investor agrees that data regarding the investor contained in the application form and arising from the business relationship with the Fund and/or its Management Company may be stored, modified or used in any other way by the Fund and/or its Management Company for the purpose of administering and developing the business relationship with the Investor. To this end data may be transmitted to Bank Vontobel AG, Zurich, financial advisers working with the Fund and/or its Management Company, as well as to other companies being appointed to support the business relationship (e.g. external processing centers, distributors or paying agents).</p>	<p>The Fund and/or its Management Company shall not normally divulge any confidential information concerning the Investor. The Investor agrees that data regarding the investor contained in the application form and arising from the business relationship with the Fund and/or its Management Company may be stored, modified or used in any other way by the Fund and/or its Management Company for the purpose of administering and developing the business relationship with the Investor. To this end data may be transmitted to the Management Company’s affiliates, branches, subsidiaries and parent company and each of their respective affiliates, directors, officers or employees (this shall include without limitation Vontobel Group companies and their employees), delegates and service providers of the Fund and the Management Company, financial advisers working with the Fund and/or its Management Company, as well as to other companies being appointed to support the business relationship (e.g. external processing centers, distributors or paying agents).</p>

## 2. Changes to the reference currency and the investment policy of the sub-fund Vontobel Fund – Global Bond and its renaming to Vontobel Fund – Sustainable Global Bond

The reference currency of the sub-fund will change from US Dollar to Euro. The investment policy of the sub-fund Vontobel Fund – Global Bond will be changed in a way that the sub-fund shall put particular effort on integrating environmental, social and governance (ESG) criteria in the investment process by directing investments in more sustainable issuers which meet the investment manager's ESG criteria. The ESG investment process shall consist of a quantitative screening based on third-party provider data followed by a qualitative analysis of the material ESG risks by the portfolio manager. Material ESG risks include but are not limited to treatment of employees, energy efficiency measures, board structures, product safety and business ethics. ESG analysis shall therefore be a part of the portfolio manager's fundamental analysis and serve as an indicator whether a company has a consistent overall sustainability management and handles controversies professionally. Controversies in focus include but are not limited to severe human rights violation, severe and preventable contribution to environmental degradation, child labour as well as bribery and corruption. Moreover, countries committing to sustainability principles can have a stronger institutional framework as well as sounder social and environmental development that allow for sustainable long-term economic growth. In addition, ESG analysis shall become part of the fundamental country analysis and an indicator of a country's ability to achieve long-term stable growth locally and globally.

The investment strategy and risk profile of the sub-fund shall change accordingly. The sub-fund shall be renamed to reflect the foregoing amendment.

## 3. Changes to the investment policy of the sub-fund Vontobel Fund – Swiss Mid and Small Cap Equity

The investment objective of the sub-fund will be changed by deleting the addition "the best possible" return. The new investment objective reads, therefore, as follows:

"Vontobel Fund – Swiss Mid and Small Cap Equity (the Sub-Fund) aims to achieve capital growth in CHF".

The investment universe of this sub-fund will be extended to additionally include companies that are listed on one of the Swiss stock exchanges. The new version of the investment policy reads as follows (changes are highlighted in bold):

"While respecting the principle of risk diversification, the Sub-Fund's assets are invested mainly in equities, equity-like transferable securities, participation certificates etc. issued by mid and small cap companies based in Switzerland, **listed on a Swiss stock exchange** and/or which conduct the majority of their business in Switzerland. Up to 33% of the Sub-Fund's assets may be invested outside the aforementioned investment universe. The Sub-Fund may also hold cash."

The definition of "mid and small cap Swiss companies" shall also change and refer to companies **which are constituents in the Swiss Performance Index (SPI) Extra** (previously: with a market capitalization that at the time of investment is less than or equal to 0.75% of the total Swiss stock market capitalization).

**4. Changes to the investment policy of the sub-fund Vontobel Fund – Global Corporate Bond Mid Yield**

The investment policy of this sub-fund shall be extended to include convertible bonds and bonds with warrants.

The investment strategy and risk profile of the sub-fund shall change accordingly.

**5. Changes to the investment policy of the sub-fund Vontobel Fund – Euro Short Term Bond**

The investment policy of this sub-fund shall be extended to include exposure to asset-backed and mortgage-backed securities which shall not exceed 5% of the sub-fund's net assets.

The investment strategy and risk profile of the sub-fund shall change accordingly.

**6. Change of the investment decision-making process in the sub-fund Vontobel Fund - mtx Sustainable Global Leaders and its renaming in Vontobel Fund – Smart Data Equity**

The investment decision-making process pursued by the portfolio manager of the sub-fund Vontobel Fund – mtx Sustainable Global Leaders shall be changed. The stock selection and portfolio monitoring processes shall still be based on fundamental analysis of the companies belonging to the investment universe. A significant part of this process shall, however, be based on the proprietary “smart data approach” which uses and combines a large set of fundamental company data servicing as a decision base for the portfolio manager.

To reflect this change, the sub-fund shall be renamed in Vontobel Fund – Smart Data Equity.

**7. Change of the operational cycle of the sub-fund Vontobel Fund – Vescore Global Equity Multi Factor**

The operational cycle for trading in the sub-fund Vontobel Fund – Vescore Global Equity Multi Factor will be changed in a way that in derogation from the provisions of sections 12 to 14 of the general part of the Prospectus, the subscription applications duly received on any business day (Subscription Day) shall be settled at the issue price calculated two business days after the Subscription Day based on the closing prices of the business day immediately following the Subscription Day. The payment of the issue price must be received by the depositary within three business days following the Subscription Day.

The above provision applies to redemption and conversion applications *mutatis mutandis*.

**8. Clarification of the investment policy of the the sub-fund Vontobel Fund – Non-Food Commodity**

To align the description of the investment policy and investment strategy in the sales prospectus across all the sub-funds of the “Commodity” sub-funds family, some further details on the investment strategy will be added to the Prospectus covering the above sub-fund. This wording is identical to the wording included in all other sub-funds of the “Commodity” sub-fund family and is of descriptive nature only.

This addition will not result in any change in the investment strategy or investment decision-making process.

## 9. Definition of the Business Day

The definition of the business day applicable to the sub-funds in the Prospectus of the Fund will be changed.

The revised definition specifies that shareholders may submit subscription, redemption, conversion and transfer requests for shares on any day on which the banks in Luxembourg are open for normal business (i.e. excluding Saturdays, Sundays, Good Friday, 24 December, 31 December and public holidays; the "Business Day").

A day on which one or more exchanges or markets on which instruments are traded that build the basis for valuing a substantial portion of the total net assets of a specific sub-fund are closed is not a Business Day.

Under these new terms, Good Friday, 24 December and 31 December will not be Business Days anymore.

## 10. Maximum Management Fee Change Vontobel Fund – Emerging Markets Blend

Maximum amounts of the management fees in the sub-fund Vontobel Fund – Emerging Markets Blend will be changed as follows:

ISIN	Share Class Name	Previous Max Management Fee, %, p.a.	New Max Management Fee, %, p.a.
LU1922347866	A	1.10	1.25
LU1963342115	B	1.10	1.25
LU1896847628	HI (hedged)	0.55	0.625
LU1896847891	HI (hedged)	0.55	0.625
LU1896848279	HS (hedged)	0.00	0.00
LU1256229680	I	0.55	0.625
LU1896847974	R	1.10	1.25

## 11. Miscellaneous

In addition, a general update has been made to the general part of the Prospectus. A clarification of the definition of the US Person has been done. There is, however, no material change regarding this term.

The above changes shall be effective as from 15 November 2019.

Changes stipulated in sections 1-7 and 10 here above shall be effective as from 17 December 2019. Investors who do not agree with those changes may redeem their shares free of charge by 3.45 p.m. or 2.45 p.m., respectively (as applicable for the relevant sub-fund), Luxembourg time on 16 December 2019, at the latest, via the Fund's administrator, distributors and other offices authorized to accept redemption applications.

Investors are advised to consult their own legal, financial and/or tax advisors if they have any questions regarding the above changes.

The updated version of the Prospectus may be obtained free of charge from the registered office of the Fund or from the Fund's distributors.

## **The Board of Directors**