

**VONTOBEL ASSET MANAGEMENT S.A.**

(the “**Management Company**”)

on behalf of

**VONTOBEL FUND**

Investment company with variable capital  
49, Avenue J.F. Kennedy, L-1855 Luxembourg  
RCS Luxembourg B38170

and

**VONTOBEL FUND II**

Investment company with variable capital  
49, Avenue J.F. Kennedy, L-1855 Luxembourg  
RCS Luxembourg B131432

(the “**Funds**”)

Luxembourg, 4 December 2024

**NOTIFICATION TO SHAREHOLDERS**

The Management Company wishes to inform you of changes to the Sub-Fund specific Sustainability Related Disclosures on the website.

A new Exclusion Framework is being introduced which will be applied to the Sub-Funds mentioned below. This updated approach will provide a minimum standard of exclusions across the Sub-Funds in scope of the Exclusion Framework.

The Exclusion Framework aims to align with a clear and uniform standard, enhancing transparency for shareholders. This setup will allow the relevant Investment Manager to streamline processes, reduce redundancies, and allow for a more agile response to new regulatory and market developments. The investment profiles of the Sub-Funds will not change through the implementation of the Exclusion Framework.

The Exclusion Framework is structured around three levels as illustrated below. Percentages in the below table are expressed as the percentage of revenue an issuer derives from the respective activity:

EXCLUSION LEVEL	LEVEL 1	LEVEL 2	LEVEL 3 <sup>1</sup>
<b>Critical controversies</b>			
International sanctions	✓	✓	✓
Critical ESG Events	✓	✓	✓
<b>Weapons</b>			
Controversial weapons	0%	0%	0%
Nuclear weapons		0%	0%
Conventional weapons			10%
<b>Energy</b>			
<b>Extraction<sup>2</sup></b>			
Thermal coal		10%	1% and/or expansion projects
Oil sands & Arctic drilling		10%	5%
Oil			10%
Gas			50%
<b>Carbon intensive power generation</b>			
Thermal coal		25% <sup>3</sup>	10%
Other sources of high CO <sub>2</sub> e intensity power generation <sup>4</sup>			50%
<b>Other controversial activities</b>			
Tobacco	Production		5%
	Distribution		10%
Adult entertainment	Production		10%
	Distribution		10%
Alcohol	Production		10% <sup>5</sup>
	Distribution		10% <sup>5</sup>
Gambling	Operations		10% <sup>5</sup>
<b>Sovereign issuers</b>			
Country exclusion list			✓

Further details about the Exclusion Framework will be available on our website under <https://www.vontobel.com/esg-library/>.

<sup>1</sup> This level is aligned with the exclusions set out for the Paris Aligned Benchmarks (Article 12 EU Regulation for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks)

<sup>2</sup> In this context, the term « extraction » is understood as exploration, mining, extraction, refining or distribution.

<sup>3</sup> For companies mainly operating in emerging market companies, exceptions can apply considering 'Just transition' aspects. More details can be found in our Exclusion Framework under <https://www.vontobel.com/esg-library/>.

<sup>4</sup> Defined as such if power generation has a GHG intensity of more than 100 g CO<sub>2</sub> e/kWh

<sup>5</sup> Our approach is guided by nuanced evaluation on a case-by-case basis rather than blanket exclusions. We understand that within these industries, there are varying levels of social and environmental responsibility. Companies engaged in alcohol or gambling may demonstrate responsible practices, including initiatives, policies and campaigns promoting moderation and health. Where this is not the case, or where we are not in a position to conclude such assessment, we apply a 10% revenue threshold related to these activities.

The subsequent sections of this letter indicate which level will be applied by the respective Sub-Funds.

The implementation of the Exclusion Framework will imply that the exclusion rules followed by the respective Sub-Funds will change, however, it is not expected that the Sub-Funds will actively seek exposure to activities previously excluded.

The sections on *Exclusions* in the website disclosures form part of the binding elements of the investment strategy of the sub-funds mentioned below and will be updated as follows:

### 1. Vontobel Fund – Sustainable Swiss Franc Bond

Before change	After change
<p>Sector/business activity-based exclusions:</p> <ul style="list-style-type: none"> <li>– Adult entertainment (Production: 5%; Downstream: 10%)</li> <li>– Agrochemicals (Production: 5%)</li> <li>– Airlines (Production: 5%)</li> <li>– Chlorine chemistry (Production: 5%)</li> <li>– Conventional weapons, incl. firearms (Production: 5%)</li> <li>– Coal (thermal) (Production: 5%)</li> <li>– Gambling (Upstream: 10%; Production: 5%)</li> <li>– Genetic engineering plant (Production: 5%)</li> <li>– Genetic engineering pharma (Production: 5%)</li> <li>– Nuclear energy (Upstream: 5%; Production: 5%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Other Fossil Fuel (i.e. Tar /Oil Sands...) (Production: 5%)</li> <li>– Research on human embryos (Production: 5%)</li> <li>– Tobacco (Production: 5%; Downstream: 10%)</li> <li>– Unconventional / controversial weapons (Production: 0%)</li> </ul> <p>Sovereign exclusions:</p> <ul style="list-style-type: none"> <li>– Freedom House (Not Free)</li> <li>– Paris-Agreement (Not Ratified)</li> <li>– Global Peace Index (Low, very low)</li> <li>– Death penalty</li> </ul>	<p>Vontobel Exclusion Level 3</p>

## 2. Vontobel Fund – Sustainable Emerging Markets Local Currency Bond

Before change	After change
– Freedom House (Not Free)	Vontobel Exclusion Level 3

## 3. Vontobel Fund – Active Beta Opportunities Plus

**Vontobel Fund – Multi Asset Defensive**

**Vontobel Fund – Multi Asset Solution**

**Vontobel Fund II – Active Beta Opportunities**

**Vontobel Fund II – Active Beta**

Before change	After change
<p>Sector/business activity-based exclusions:</p> <ul style="list-style-type: none"> <li>– Adult entertainment (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Alcohol (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Coal (Production: 10%; Downstream (power generation, distribution): 10%)</li> <li>– Conventional weapons (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Gambling (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Nuclear weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> <li>– Other Fossil Fuel (i.e. Tar /Oil Sands...) (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Tobacco (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul> <p>Sovereign exclusions</p> <ul style="list-style-type: none"> <li>– Freedom house (Not Free)</li> <li>– Issuers not party to the Biological Weapon Convention Chemical Weapon Convention*</li> </ul> <p>* The Sub-Fund may invest in bonds issued by supranational organizations that cannot be party of such conventions, however, in that case, the majority of the countries represented by these organizations shall be party of such conventions.</p>	Vontobel Exclusion Level 2

**4. Vontobel Fund – Euro Corporate Bond  
Vontobel Fund – Global Corporate Bond**

<b>Before change</b>	<b>After change</b>
<ul style="list-style-type: none"> <li>– Adult entertainment (Production: 5%; Downstream: 25%)</li> <li>– Conventional weapons, incl. firearms (Production: 10%)</li> <li>– Coal (thermal) (Production: 10%)</li> <li>– Coal power (Production: 25%)</li> <li>– Gambling (Upstream: 25%; Production: 5%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Tobacco (Upstream: 25%; Production: 5%; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Production: 0%)</li> </ul>	Vontobel Exclusion Level 2

**5. Vontobel Fund II – Duff & Phelps Global Listed Infrastructure**

<b>Before change</b>	<b>After change</b>
<ul style="list-style-type: none"> <li>– Adult entertainment (Upstream: 0%)</li> <li>– Production: 0%; Downstream: 0%)</li> <li>– Alcohol (Upstream: 0%; Production: 0% Downstream: 0%)</li> <li>– Coal (thermal) (Upstream: 0%; Production: 0%; Downstream 0%)</li> <li>– Gambling (Upstream: 0%; Production: 0%; Downstream: 0%)</li> <li>– Nuclear energy (Production: 20%)*</li> <li>– Tobacco (Upstream: 0%; Production: 0%; Downstream: 0%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul>	Vontobel Exclusion Level 2

**6. Vontobel Fund – Global Active Bond  
Vontobel Fund – Euro Short Term Bond**

<b>Before change</b>	<b>After change</b>
<ul style="list-style-type: none"> <li>– Conventional weapons, incl. Firearms (production: 10%)</li> <li>– Coal (thermal) (Production: 10%)</li> <li>– Coal power (Production: 25%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Tobacco (Upstream: 25%; Production: 5% ; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Production: 0% )</li> </ul>	Vontobel Exclusion Level 2

**7. Vontobel Fund – mtX Sustainable Emerging Markets Leaders**  
**Vontobel Fund – mtX Sustainable Asian Leaders (ex Japan)**  
**Vontobel Fund – mtX Emerging Markets Leaders ex China**

Before change	After change
<ul style="list-style-type: none"> <li>– Adult entertainment (Production: 10%; Distribution: 10%)</li> <li>– Coal (Production: 10%)</li> <li>– Coal powered electricity (Production: 10%)</li> <li>– Nuclear power (Production: 10%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Oil sands (Production: 10%)</li> <li>– Palm Oil (Production: 0%; Distribution: 0%)</li> <li>– Tobacco (Production: 0%; Retail: 10%)</li> <li>– Controversial weapons (Production: 0%)</li> <li>– Military Contracting (Production: 10%)</li> <li>– All other weapons &amp; Firearms (Production: 0%)</li> </ul>	<p>Vontobel Exclusion Level 2</p> <p>Additionally, the Sub-Funds will apply following exclusions:</p> <ul style="list-style-type: none"> <li>– Conventional weapons (10% revenue threshold)</li> <li>– Thermal coal power generation (10% revenue)</li> </ul>

**8. Vontobel Fund II – mtX Emerging Markets Sustainability Champions**

Before change	After change
<ul style="list-style-type: none"> <li>– Adult entertainment (Production: 0%; Distribution: 5%)</li> <li>– Alcohol (Production: 0%; Retail: 10%)</li> <li>– Conventional weapons, incl. firearms (Production: 0%)</li> <li>– Coal (Upstream: 5%; Production: 0%; Downstream: 5%)</li> <li>– Coal powered electricity (Production: 5%)</li> <li>– Gambling (Production: 5%)</li> <li>– Games that glorify violence (Production: 10%)</li> <li>– Gas (Production: 0%)</li> <li>– Gas powered electricity (Production: 5%)</li> <li>– Genetically Modified Organisms (Production: 5%)</li> <li>– Nuclear power (Production: 5%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Oil (Production: 0%)</li> <li>– Oil power (Production: 5%)</li> <li>– Oil Sands (Production: 0%)</li> <li>– Palm Oil (Production: 0%; Distribution: 0%)</li> <li>– Tobacco (Production: 0%; Retail: 5%)</li> <li>– Weapons (all including unconventional, controversial and firearms) (Production: 0%)</li> <li>– Military Contracting (Production: 5%)</li> <li>– Predatory Lending (Production: 0%)</li> </ul>	<p>Vontobel Exclusion Level 3</p> <p>Any exclusion criteria set out by the Towards Sustainability Quality Standard Criteria label may apply, which are available at <a href="https://towardsustainability.be">https://towardsustainability.be</a>.</p>

**9. Vontobel Fund – Global Equity**  
**Vontobel Fund – Emerging Markets Equity**  
**Vontobel Fund – Global Equity Income**  
**Vontobel Fund – Asia ex Japan**  
**Vontobel Fund – European Equity**

<b>Before change</b>	<b>After change</b>
<ul style="list-style-type: none"> <li>– Adult entertainment (Production: 10%; Downstream: 10%)</li> <li>– Coal (thermal) (Production: 10%; Power generation: 10%)</li> <li>– Tobacco (Production: 5%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul>	<p>Vontobel Exclusion Level 2</p> <p>Additionally, the Sub-Funds will apply following exclusions:</p> <ul style="list-style-type: none"> <li>– Thermal coal power generation (10% revenue)</li> </ul>

**10. Vontobel Fund – US Equity**

<b>Before change</b>	<b>After change</b>
<ul style="list-style-type: none"> <li>– Adult entertainment (Production: 10%; Downstream: 10%)</li> <li>– Coal (thermal) (Upstream (extraction):10%; Downstream (power generation, distribution): 10%)</li> <li>– Oil (Upstream 10%)</li> <li>– Gas (Upstream: 10%)</li> <li>– Other Fossil Fuel (i.e. Tar /Oil Sands...) (Upstream: 10%)</li> <li>– Tobacco (Production: 5%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul>	<p>Vontobel Exclusion Level 2</p> <p>Additionally, the Sub-Funds will apply following exclusions:</p> <ul style="list-style-type: none"> <li>– Thermal coal (Power generation: 10%)</li> <li>– Oil (Upstream 10%)</li> <li>– Gas (Upstream: 10%)</li> <li>– Other Fossil Fuel (i.e. Tar /Oil Sands...) (Upstream: 10%)</li> </ul>

## 11. Vontobel Fund – Global Environmental Change

Before change	After change
<ul style="list-style-type: none"> <li>– Adult entertainment (Upstream: 5%; Production: 5%; Downstream: 5%)</li> <li>– Alcohol (Production: 5%; Downstream: 10%)</li> <li>– Coal (thermal) (Upstream: 1%; Production: 1%; Downstream: 1%)</li> <li>– Fur (Upstream: 5%; Production: 5%; Downstream: 5%)</li> <li>– Gambling (Upstream: 5%; Production: 5%; Downstream: 5%)</li> <li>– Gas (Production: 5%)</li> <li>– Military Contracting (Upstream: 5%; Production: 5%; Downstream: 5%, exclusions apply to weapon related revenues)</li> <li>– Nuclear energy (Production: 20%)*</li> <li>– Nuclear weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> <li>– Oil (Production: 5%)</li> <li>– Other Fossil Fuel (i.e. Tar /Oil Sands, Shale Gas...) (Production: 5%)</li> <li>– Palm Oil (Upstream: 5%; Production: 5%; Downstream: 5%)</li> <li>– Tobacco (Production: 5%; Downstream: 10%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul>	<p>Vontobel Exclusion Level 3</p> <p>Any exclusion criteria set out by the Towards Sustainability Quality Standard Criteria label may apply, which are available at <a href="https://towardsustainability.be">https://towardsustainability.be</a>.</p>
<p>Any exclusion criteria set out by the Towards Sustainability Quality Standard Criteria label may apply, which are available at <a href="https://towardssustainability.be">https://towardssustainability.be</a>.</p>	
<p>* Plant location risks and operational safety track record of nuclear facilities are carefully assessed and can lead to an exclusion.</p>	



**12. Vontobel Fund – Energy Revolution**  
**Vontobel Fund II – Megatrends**

Before change	After change
<ul style="list-style-type: none"> <li>– Conventional weapons, incl. Firearms (Upstream: 10%; Production: 10%; Downstream: 10%)</li> <li>– Coal (thermal) (Upstream: 10%; Production: 10%; Downstream: 10%)*</li> <li>– Nuclear energy (Upstream: 10%; Production: 10%; Downstream: 10%) *</li> <li>– Tobacco (Production: 5%; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Upstream: 0%; Production: 0%; Downstream: 0%)</li> </ul> <p>* Exceptions apply related to companies that exceed the given revenue threshold in thermal coal. These companies are investable if they have a specific climate transition strategy in the next one to three decades in place, such as quantitative Co2 emission reduction or net zero targets via increase of capital expenditures and production capacity in alternative energy in the next one to three decades and additionally have exit strategies from thermal coal in place or their revenue share in these two areas decreases.</p>	<p>Vontobel Exclusion Level 2</p>

**13. Vontobel Fund – Sustainable Emerging Markets Debt**

Before change	After change
<ul style="list-style-type: none"> <li>– Alcohol (Upstream: 25%; Production: 5%; Downstream: 25%)</li> <li>– Conventional weapons, incl. firearms (Production: 10%)</li> <li>– Coal (thermal) extraction (Production: 10%)</li> <li>– Coal (thermal) power (Production: 25%)</li> <li>– Gambling (Upstream: 25%; Production: 5%)</li> <li>– Nuclear energy (Production: 25%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Palm Oil (Production: 10%)</li> <li>– Soft Drinks (Production: 10%)</li> <li>– Steelmaking coal (Production: 10%)</li> <li>– Tobacco (Upstream: 25%; Production: 5%; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Production: 0%)</li> </ul>	<p>Vontobel Exclusion Level 3</p>

**14. Vontobel Fund – Emerging Markets Debt**  
**Vontobel Fund – Emerging Markets Corporate Bond**  
**Vontobel Fund – Emerging Markets Investment Grade**  
**Vontobel Fund – Emerging Markets Blend**

Before change	After change
<ul style="list-style-type: none"> <li>– Conventional weapons, incl. Firearms (Production: 10%)</li> <li>– Coal (thermal) extraction (Production: 10%)*</li> <li>– Coal (thermal) power (Production: 25%)*</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Tobacco (Upstream: 25%; Production: 5%; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Production: 0%)</li> </ul> <p>* Exceptions apply related to companies that exceed the given revenue threshold in thermal coal. These companies are investable if they have a specific climate transition strategy in the next one to three decades in place, such as quantitative CO2e emission reduction, an increase of capital expenditures and production capacity in alternative energy, exit strategies from thermal coal or decreasing revenue shares or there is no alternative to provide access to electricity (basic need) in certain regions in emerging markets.</p>	<p>Vontobel Exclusion Level 2</p>

**15. Vontobel Fund – Sustainable Global Bond**  
**Vontobel Fund – Green Bond**

Before change	After change
<ul style="list-style-type: none"> <li>– Conventional weapons, incl. Firearms (production: 10%)</li> <li>– Coal (thermal) (Production: 10%)</li> <li>– Coal power (thermal) (Production: 25%)</li> <li>– Nuclear weapons (Production: 0%)</li> <li>– Tobacco (Upstream: 25%; Production: 5%; Downstream: 25%)</li> <li>– Unconventional / controversial weapons (Production: 0%)</li> </ul>	<p>Vontobel Exclusion Level 3</p>

The changes described above shall be effective as of 7 January 2025. The updated disclosures will be available in the Exclusion Framework document on the website here <https://am.vontobel.com/en/vontobel-funds>.

Investors affected by the changes above and who do not agree with the changes may redeem their shares free of charge by the relevant cut-off time on 6 January 2025 via the Fund's administrator, distributors and other officers authorized to accept redemption applications.