

COUNTRY SUPPLEMENT
E.I. STURDZA FUNDS, PLC (THE "COMPANY")

ADDITIONAL INFORMATION FOR INVESTORS IN AUSTRIA

This Country Supplement forms part of and should be read in conjunction with the Prospectus for E.I. Sturdza Funds, plc (the "Company") dated 29th November 2018, which includes the Supplements for the Strategic China Panda Fund, the Strategic Euro Bond Fund, the Nippon Growth (UCITS) Fund, Strategic Europe Value Fund, the Strategic Global Bond Fund, the Strategic US Momentum and Value Fund, the Strategic Global Quality Fund, the Strategic European Smaller Companies Fund, the Strategic Quality Emerging Bond Fund, the Strategic Beta Flex Fund, the Strategic Bond Opportunities Fund, the Sturdza Family Fund and the Strategic Japan Opportunities Fund each of which is dated 29th November 2018 (collectively the "Prospectus" as same may be amended from time to time). All capitalised terms contained herein shall have the same meaning in this Country Supplement as in the Prospectus unless otherwise indicated. Further, this Country Supplement should be read in conjunction with the Key Investor Information Documents and the latest available annual and semi-annual report relating to Shares in the Company.

The Directors of the Company, whose names appear under the heading "Management and Administration" are the persons responsible for the information contained in this Prospectus and accept responsibility accordingly. To the best of the knowledge and belief of the Directors (who have taken all reasonable care to ensure that such is the case) the information contained in this document is in accordance with the facts and does not omit anything likely to affect the import of the information.

Distribution in Austria

The public distribution of the shares the following Funds of **E.I. Sturdza Funds plc** have been notified to the Financial Market Authority ("Finanzmarktaufsichtsbehörde") in Austria in accordance with § 140 para 1 InvFG 2011:

Strategic China Panda Fund

Nippon Growth (UCITS) Fund

Strategic Europe Value Fund

Strategic Global Quality Fund

Strategic European Smaller Companies Fund

Strategic Bond Opportunities Fund

Sturdza Family Fund

The Company has notified the Financial Market Authority pursuant to § 140 para 1 Investment Fund Act (InvFG 2011) of its intention to distribute shares of an investment fund in Austria. In accordance with EC Directive 2009/65/EC, as amended, the Company qualifies as a UCITS.

Austrian Paying Agent pursuant to § 141 para 1 InvFG 2011

Erste Bank der oesterreichischen Sparkassen AG
Am Belvedere 1,
1100 Wien
Austria

has assumed the function of a paying agent pursuant to § 141 para 1 InvFG 2011.

Requests for redemption may be made with the Austrian Paying Agent.

At the request of a Shareholder, payments between the Company and the Shareholder in Austria may be settled via the Austrian Paying Agent.

Available documents and information

This Prospectus, the Key Investor Information Documents, the Memorandum and Articles of the Company, the latest audited annual accounts and semi-annual reports, as well as other information and documents relating to the Company are available for perusal and can be obtained free of charge at the offices of the Austrian Paying Agent every day (except Saturdays, Sundays and bank holidays).

Publication of Information

The subscription price and the redemption price per Share as well as all other shareholder specific communications and information concerning the Company are available from the Austrian Paying Agent and from the Company. In addition, prices are published on the website www.eisturdza.com and www.bloomberg.com.

Tax Representation

Erste Bank der oesterreichischen Sparkassen AG, Am Belvedere 1, 1100 Wien, has assumed the function of a domestic tax representative pursuant to § 186 para 2 subpara 2 InvFG 2011.

Austrian investors are hereby informed that the tax status of Shares in the Fund of the Company as “reporting fund” or “non-reporting fund” in Austria is disclosed in the OeKB list to be found at “www.profitweb.at”.

Fund units of reporting funds as well as of non-reporting funds acquired against consideration after 31 December 2010 are subject to tax on realised capital gains after deducting income equivalent to distribution (being non-distributed income) that was already subject to tax due to the sale of fund units irrespective of any period during which the fund units were held. Moreover,

fund units of reporting funds are subject to tax in respect of income equivalent to distribution derived from such fund units in line with amended rules on the principle of tax transparency and the set-off of losses within the fund. If income equivalent to distribution is later distributed, it will not be subject to tax. If taxable income included in distributions and in income equivalent to distribution is not evidenced by a tax representative towards OeKB (i.e. the fund is a non-reporting fund), a lump sum taxation applies at a tax rate of 27,5%; the assessment basis for income equivalent to distribution equals 90% of the difference amount between the redemption prices at the beginning and at the end of the calendar year, with a minimum assessment basis of 10% of the last redemption price within the calendar year. For investors holding fund units qualifying as private assets, a 27,5% withholding tax to be deducted by an Austrian paying agent (i.e in general a bank located in Austria keeping a securities account for an investor on which the fund units are booked for the investor) applies to distributions and income equivalent to distribution including 60% of realized retained capital gains of all fund assets. The Austrian Parliament has passed the Act on Implementation of Common Reporting Standards for the Automatic Exchange of Financial Account Information implementing Directive 2014/107/EU on Mandatory Automatic Exchange of Information in the Field of Taxation in December 2014. Austria therefore automatically exchanges financial account related data for existing accounts with Austrian banks or Austrian branches of banks with regard to disclosure periods from 1 January 2017 and for newly opened accounts with regard to disclosure periods from 1 October 2016, beginning with 2017 and thereafter.

As of 1 January 2017, for non-resident individuals who are additionally resident in a state not participating in the Automatic Exchange of Information with Austria, interest income derived from an in-scope fund reporting separately the amount of interest income from Austrian issuers (invested to an extent of more than 15% in assets generating interest income from Austrian issuers) where the fund is held in a securities account with Austrian banks or Austrian branches of banks is subject to a modified special 27,5% Austrian withholding tax for non-residents. If there is no separate reporting of such interest income, but the fund in general reports to Oesterreichische Kontrollbank the amount of distributions and of income equivalent to distributions, then the whole amount of distributions and of income equivalent to distributions is subject to the special 27,5 % Austrian withholding tax. As of 1 January 2017, for new holders of accounts not previously held with the Austrian financial institution operating the account, where the accountholders are resident in a state participating in the Automatic Exchange of Information with Austria, the special 27,5% Austrian withholding tax is also applied unless the new accountholder evidences by means of a certificate of residence towards the Austrian financial institution that he is tax resident in a participating state. Only funds invested to an extent of more than 15% in assets generating interest income from Austrian issuers is subject to this special Austrian withholding tax (*in-scope funds*). If the fund is a non-reporting fund and non-distributing, the tax basis (income equivalent to distributions) for such special withholding tax is calculated on a lump sum basis of 6% of the redemption price determined as of any 31 December following the acquisition date or, in the case of a disposal, of 0,5% of the redemption price for each month of the current calendar year. Further, in the case of non-reporting distributing funds, the whole distribution amount is subject to this special withholding tax.

Investors in the Shares in the Fund of the Company are advised to consult their tax advisors with respect to the tax treatment of a subscription (purchase), exchange, redemption of shares and of distributions and capital gains derived from the shares. The tax treatment of Shares in the Fund may be subject to changes after subscription. The individual tax circumstances and their assessment by the investor are not subject matter to the agreement between the investor and the Company.

Investors who are consumers within the meaning of the Austrian Consumer Protection Act and who rendered their subscription form neither in the business premises of a bank, an investment firm or an investment service provider company, an insurance company, an owner of business, a professional or any other entrepreneur nor at a stand, at a fair or market place which is used by such person (company) for business purposes, but in any case only after previous discussions with (agents of) the entrepreneur (company), may withdraw their subscription in written form or by fax until the conclusion of the contract or within one week from the conclusion of the contract without stating any reasons. The letter of withdrawal must be addressed to the Austrian Paying Agent.

Marketing Restrictions

Cold calling, cold transmission of fax messages and cold e-mailing for the purposes of marketing the Shares of the Company in relation to investors domiciled or having their habitual abode in Austria, is prohibited. Any information relating to the marketing of Shares in the Fund must refer to this Prospectus and the Key Investor Information Documents as published in Austria and details of where and in which language the Prospectuses and the Key Investor Information Documents may be inspected. Moreover, any such information or marketing must contain a rider disclosing that past performance of the Shares in the Fund is not a reliable indicator of future performance. Performance related information or marketing and comparative information or marketing for the Shares in the Fund must further, in case of use by legal entities that have their domicile or branch office in Austria, comply with the Austrian law provisions. All marketing communication must further be clearly recognizable as marketing communication. All information including marketing communications must include the name of the offeror, it must be accurate and in particular must not emphasise any potential benefits of the Shares in the Fund without also giving a fair and prominent indication of any relevant risks. Any information including marketing communication shall be sufficient for, and presented in a way that is likely to be understood by, the average member of the group to whom it is directed, or by whom it is likely to be received. It shall not disguise, diminish or obscure important items, statements or warnings.

DATED 21 December 2018