



EdenTree Investment Management
24 Monument Street,
London EC3R 8AJ

[edentreeim.com](https://www.edentreeim.com)

To: All Investors in the funds listed in the Appendix (the “**Funds**”)

You do not need take any action, however we do recommend that you read this letter.

Dear Investor,

We, EdenTree Investment Management Limited, as Authorised Fund Manager of the Funds, are writing to you as an investor in the fund listed in the Appendix.

The Funds are being updated to clarify that the Funds have not adopted a sustainability label in line with the new rules under the FCA’s Sustainability Disclosure Requirements (SDR).

What are the Sustainability Disclosure Requirements (SDR)?

In November 2023, the FCA published its Policy Statement (PS23/16), Sustainable Disclosure Requirements and investment labels (known as “SDR”). The Policy Statement set out the rules on anti-greenwashing, a new labelling regime, naming and marketing rules and product and entity level disclosures.

Currently, SDR is solely applicable to funds domiciled in the UK. SDR presents a package of measures, namely sustainability-related product labels, disclosures at fund and fund manager level, a rule against greenwashing, and additional regulations concerning sustainable investing in the UK.

The FCA’s objective for SDR is to ensure that “financial products that are marketed as sustainable should do as they claim and have the evidence to back it up”. The sustainability labels aim to clearly differentiate between i) sustainability labelled funds that qualify as sustainable, ii) unlabelled funds that have environmental, social, and governance (ESG) characteristics in their branding or marketing, and iii) non-ESG funds.

Our approach - What changes are being made as a result of SDR?

With this in mind, we have decided to update the disclosures within the Funds' prospectus in order to comply with the requirements for funds that have sustainability characteristics but have not adopted a sustainability label. These changes will take effect on 28th March 2025.

These changes will not affect the way the Funds are currently managed and will not change the risk profile of the Funds.

As part of these changes, we are making the following changes:

1. **Name** - changing the name of the Funds to remove the words "Responsible and Sustainable". This is to make it clearer that the Funds do not have a sustainability label under SDR.
2. **Disclaimer** - adding a disclaimer to the prospectus disclosures for each Fund, to make it clear that the Funds have not adopted a sustainability label.
3. **Sustainability Approach** - adding a sustainability approach section, to clarify how the Funds will invest.
4. **Metrics** - adding metrics for each Fund that will be reported on an ongoing basis, to help investors understand the sustainability characteristics of the Funds.

We have included full details of the changes to the Funds' names and investment policies in the Appendix. In addition, a new document, a "Sustainability Disclosure" will be created, providing a summary of the Funds' sustainability approach and sustainable characteristics. You can find a copy of this document on our website: <https://www.edentreeim.com/fund-literature>

What action should you take

This letter is for information purposes and you are not required to take any action.

If you have any questions regarding this change, including a reminder of your options if you would like to redeem your investment on the basis of this change, please contact EdenTree Investment Management Limited on 0800 358 3010 between 9.00 a.m. and 5.00 p.m. Monday to Friday, but please be aware that we are not authorised to give investment advice. If you are uncertain as to the contents of this letter, you should consult a financial adviser.

Yours sincerely,



Andy Clark

Chief Executive Officer, EdenTree Investment Management Limited

Your questions on the Sustainability Disclosure Requirements (SDR) and fund labelling regime answered

- **What is SDR and why was it introduced?**

“SDR” is a shorthand acronym for the Financial Conduct Authority’s (FCA) new *Sustainability Disclosure Requirements and fund labelling* regulations.

With the introduction of new sustainability fund labels and increased fund disclosure requirements, the purpose of SDR is to promote greater transparency and consistency in how UK asset managers label and market sustainable investment funds.

In short, SDR will provide investors with a clearer framework for understanding the sustainability intention of a fund, as well as more information about its progress against specific sustainability goals.

It is a rigorous policy, with robust requirements for asset managers to maintain high standards of integrity, which should give investors greater confidence about an asset manager’s sustainability claims and the overall progress of a fund towards meeting its goals.

The policy has been introduced as part of a range of FCA consumer protection measures including specific regulations on Consumer Duty and Anti-Greenwashing.

- **How will this affect my investment?**

These changes will not affect the way the Fund is currently managed, and we do not expect a change to the Fund’s future performance due to the Funds not adopting a label.

- **What action do I need to take?**

You do not need to take any action. However, we do encourage you to refer to the appendix to understand the sustainability characteristics of the Fund.

Please contact EdenTree Investment Management Limited if you would like to receive a copy of the full prospectus.

APPENDIX

EDENTREE ~~RESPONSIBLE AND SUSTAINABLE~~ MULTI-ASSET CAUTIOUS FUND – PRN 954002

Investment policy

Investments— The Fund will aim to achieve its investment objective by investing in a mixed investment portfolio that has a bias towards fixed interest securities provided this remains consistent with achieving the Fund's objective. It aims to achieve its objectives with a lower level of risk relative to the other funds within the EdenTree ~~Responsible & Sustainable~~ Multi-Asset fund range. The Fund will also invest in assets in line with its Sustainability Approach, as outlined below.

The Fund will seek to achieve the investment objective by investing indirectly in assets through other funds. ~~The Fund will invest in units in collective investment schemes including those within the EdenTree range of funds.~~ as well as by investing directly in a mixture of different asset classes (including, but not limited

~~The Fund will gain exposure to other assets including property or real estate investment trusts and to, UK and overseas equities, bonds, cash, listed infrastructure and property REITs).~~ It may also gain exposure to commodities through other collective investment schemes, invest in exchange traded commodities and derivatives. The Fund ~~may invest in funds which target organisations whose core business is to address major social and/or environmental challenges. These investments may have different criteria for responsible investment to our own responsible and sustainable investment approach described below. Where such funds are managed by EdenTree and/or external companies and their underlying assets do not meet our responsible and sustainable criteria, investment in those assets will be limited to 15% of the Fund's portfolio, calculated on a look-through basis of the underlying fund's portfolio where available.~~ will invest in units in collective investment schemes including those within the EdenTree range of funds.

At least 70% of the assets of the Fund will be invested in sustainable investments in accordance with the Fund's Sustainability Approach. Up to 30% of the Fund may be invested in funds and other assets that do not meet the Sustainability Approach.

The Fund has no geographical restrictions or limits and may invest in any of the eligible markets listed in Appendix 3 of the Prospectus. Subject to the ~~Responsible and Sustainable~~ requirements detailed below, it may also invest directly in listed stocks and shares, money-market instruments, derivatives and forward transactions, deposits, nil and partly paid securities, bonds, convertible bonds, cash and near cash as deemed appropriate to meet the Fund's objective.

Strategy— The Fund intends aims to gain exposure to a mixture of different asset classes ~~(including, but not limited to, UK and overseas equities, bonds, cash, listed infrastructure and property REITs)~~ to create a blended portfolio which aims to provide returns consistent with the Fund's "cautious" risk and return profile based on a ~~five-year~~ five-year view. The Fund has a set central strategic asset allocation which is considered to represent the ~~longer-term~~ longer-term neutral asset allocation for the Fund. This is supplemented by a tactical asset allocation range which will allow some ~~short-term~~ short-term dynamic asset allocation between the different asset classes to enhance returns depending on the prevailing investment environment and outlook, whilst remaining within a risk framework compatible with the "cautious" risk and return profile. The risk and return profile represents the level of risk that is taken in respect of potential returns. A cautious profile approach means a relatively lower level of risk is taken which, usually, means less chance of loss but also lower potential returns. The proportions within each asset class, including cash, can be reduced or increased within the ranges if we believe market conditions and the outlook for particular asset classes warrant such adjustments.

Under normal market conditions the Fund will invest within the following ranges of the various asset classes. Please note that these ranges can move due to changes in market conditions and changing investment outlooks for the asset classes.

EdenTree Multi-Asset Cautious Fund – Asset class ranges

- Fixed interest and cash: 40-60%
- Equities: 30-50%
- Alternatives: 5-20%*

*Alternatives includes Real Estate Investment Trusts and Infrastructure Investment Trusts

Investment policy

Investments – The Fund will aim to achieve its investment objective by investing in a mixed investment portfolio that has a bias towards equities provided this remains consistent with achieving the Fund’s objective. It aims to achieve its objectives with a higher level of risk relative to the other funds within the EdenTree ~~Responsible & Sustainable~~ Multi-Asset fund range. The Fund will also invest in assets in line with its Sustainability Approach, as outlined below.

The Fund will seek to achieve the investment objective by investing indirectly in assets through other funds. ~~The Fund will invest in units in collective investment schemes including those within the EdenTree range of funds.~~ as well as by investing directly in a mixture of different asset classes (including, but not limited

~~The Fund will gain exposure to other assets including property or real estate investment trusts and to, UK and overseas equities, bonds, cash, listed infrastructure and property REITs).~~ It may also gain exposure to commodities through other collective investment schemes, invest in exchange traded commodities and derivatives. The Fund ~~may invest in funds which target organisations whose core business is to address major social and/or environmental challenges. These investments may have different criteria for responsible investment to our own responsible and sustainable investment approach described below. Where such funds are managed by EdenTree and/or external companies and their underlying assets do not meet our responsible and sustainable criteria, investment in those assets will be limited to 15% of the Fund’s portfolio, calculated on a look-through basis of the underlying fund’s portfolio where available.~~ will invest in units in collective investment schemes including those within the EdenTree range of funds.

At least 70% of the assets of the Fund will be invested in sustainable investments in accordance with the Fund’s Sustainability Approach. Up to 30% of the Fund may be invested in funds and other assets that do not meet the Sustainability Approach.

The Fund has no geographical restrictions or limits and may invest in any of the eligible markets listed in Appendix 3 of the Prospectus. Subject to the ~~Responsible and Sustainable~~ requirements detailed below, it may also invest directly in listed stocks and shares, money-market instruments, derivatives and forward transactions, deposits, nil and ~~partly-paid~~ partly paid securities, bonds, convertible bonds, cash and near cash as deemed appropriate to meet the Fund’s objective.

Strategy – The Fund ~~aims intends~~ to gain exposure to a mixture ~~of different asset classes of different asset classes (including, but not limited to, UK and overseas equities, bonds, cash, listed infrastructure and property REITs)~~ to create a blended portfolio which aims to provide returns consistent with the Fund’s “growth” risk and return profile based on a ~~five-year~~ five-year view. The Fund has a set central strategic asset allocation which is considered to represent the ~~longer-term~~ longer-term neutral asset allocation for the Fund. This is supplemented by a tactical asset allocation range which will allow some ~~short-term~~ short-term dynamic asset allocation between the different asset classes to enhance returns depending on the prevailing investment environment and outlook, whilst remaining within a risk framework compatible with the “growth” risk and return profile. The risk and return profile represents the level of risk that is taken in respect of potential returns. A growth profile approach means a higher level of risk is taken which, usually, means a higher chance of loss but also higher potential returns. The proportions within each asset class, including cash, can be reduced or increased within the ranges if we believe market conditions and the outlook for particular asset classes warrant such adjustments.

Under normal market conditions the Fund will invest within the following ranges of the various asset classes. Please note that these ranges can move due to changes in market conditions and changing investment outlooks for the asset classes.

EdenTree Multi-Asset Growth Fund – Asset class ranges

- Fixed interest and cash: 15-35%
- Equities: 55-75%
- Alternatives: 5-20%*

*Alternatives includes Real Estate Investment Trusts and Infrastructure Investment Trusts

Investment policy

Investments – The Fund will aim to achieve its investment objective by investing in a mixed investment portfolio that has a balance of equities and fixed interest securities provided this remains consistent with achieving the Fund's objective. It aims to achieve its objectives with a moderate level of risk relative to the other funds within the EdenTree ~~Responsible & Sustainable~~ Multi-Asset fund range. The Fund will also invest in assets in line with its Sustainability Approach, as outlined below.

The Fund will seek to achieve the investment objective by investing indirectly in assets through other funds as well as by investing directly in a mixture of different asset classes (including, but not limited to, UK and overseas equities, bonds, cash, ~~–The Fund will invest in units in collective investment schemes including those within the EdenTree range of funds.~~

~~The Fund will gain exposure to other assets including property or real estate investment trusts and listed infrastructure and property (REITs). It may also gain exposure to commodities through other collective investment schemes, invest in exchange traded commodities and derivatives. The Fund will invest in units in collective investment schemes including those within the EdenTree range of funds. ~~may invest in funds which target organisations whose core business is to address major social and/or environmental challenges. These investments may have different criteria for responsible investment to our own responsible and sustainable investment approach described below. Where such funds are managed by EdenTree and/or external companies and their underlying assets do not meet our responsible and sustainable criteria, investment in those assets will be limited to 15% of the Fund's portfolio, calculated on a look-through basis of the underlying fund's portfolio where available.~~~~

At least 70% of the assets of the Fund will be invested in sustainable investments in accordance with the Fund's Sustainability Approach. Up to 30% of the Fund may be invested in funds and other assets that do not meet the Sustainability Approach.

The Fund has no geographical restrictions or limits and may invest in any of the eligible markets listed in Appendix 3 of the Prospectus. Subject to the ~~Responsible and Sustainable~~ requirements detailed below, it may also invest directly in listed stocks and shares, money-market instruments, derivatives and forward transactions, deposits, nil and partly paid securities, bonds, convertible bonds, cash and near cash as deemed appropriate to meet the Fund's objective.

Strategy – The Fund aims intends to gain exposure to a mixture of different asset classes ~~(including, but not limited to, UK and overseas equities, bonds, cash, listed infrastructure and property REITS)~~ to create a blended portfolio which aims to provide returns consistent with the Fund's "balanced" risk and return profile based on a five-year view. The Fund has a set central strategic asset allocation which is considered to represent the longer term neutral asset allocation for the Fund. This is supplemented by a tactical asset allocation range which will allow some short term dynamic asset allocation between the different asset classes to enhance returns depending on the prevailing investment environment and outlook, whilst remaining within a risk framework compatible with the "balanced" risk and return profile. The risk and return profile represents the level of risk that is taken in respect of potential returns. A balanced profile approach means a moderate level of risk is taken which, usually, means a moderate chance of loss but also moderate potential returns. The proportions within each asset class, including cash, can be reduced or increased within the ranges if we believe market conditions and the outlook for particular asset classes warrant such adjustments.

Under normal market conditions the Fund will invest within the following ranges of the various asset classes. Please note that these ranges can move due to changes in market conditions and changing investment outlooks for the asset classes.

EdenTree Multi-Asset Balanced Fund – Asset class ranges

- Fixed interest and cash: 25-45%
- Equities: 45-65%
- Alternatives: 5-20%*

*Alternatives includes Real Estate Investment Trusts and Infrastructure Investment Trusts