

Fundsmith SICAV

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FUNDSMITH SICAV

Société d'investissement à capital variable

10 rue du Château d'Eau, L-3364 Leudelange, Grand Duchy of Luxembourg
R.C.S. Luxembourg: B164404
(the "**Fund**")

Luxembourg, October 11, 2022

INVESTOR NOTICE

Explanation of outsourcing by Northern Trust Global Services SE and extension of investor support service to cover the Asian time zone and provide local language support for investors in the Asia Pacific region

Dear Investor,

We, the board of directors of the Fund (the "**Board**"), are writing to you in the context of regulatory requirements, which apply to some of the Fund's service providers, notably to the depositary, administrative agent, registrar and transfer agent, Northern Trust Global Services SE ("**Northern Trust**"). In the context of these requirements, the *Commission de Surveillance du Secteur Financier* (the "**CSSF**") requires Northern Trust to inform the Board, and the Board to inform you, the Fund's shareholders, of the outsourcing arrangements put in place by Northern Trust and shareholders' data transfer.

We are also writing to inform you about an expanded investor service offering for investors based in the Asia Pacific region.

1. Outsourcing of the activities of Northern Trust

In order to fulfil its role, Northern Trust outsources certain tasks (including but not limited to operational, administrative and control functions, reporting, risk management, legal and regulatory compliance, client/investor services, tasks relating to group management, control functions and support functions, business continuity, product development, IT and other technical support) and has entered into outsourcing arrangements with third party service providers being affiliates or branches from the Northern Trust group which are located outside Luxembourg (and the EEA) and in particular in India, the Philippines, Hong Kong, Singapore, the United Kingdom and the United States of America

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(the “**Sub-contractors**”). More information on these Sub-contractors can be found on the following website <https://locations.northerntrust.com/index.html>.

As part of these outsourcing arrangements, Northern Trust may be required to disclose and transfer personal and confidential information and documents about the Fund, the shareholders, beneficial owners and individuals related to the shareholders such as (but not limited to):

- surname, first name, domicile, address, nationality, date and place of birth, profession (in case of legal persons: corporate name, address of registered office, registration number with the relevant corporate registry, date and place of incorporation, nationality, legal form, shareholder structure);
- information on identification documents: issuance numbers, date and place of issuance, duration of validity and copies of such documents (in case of legal persons: deed and articles of incorporation, excerpts from corporate registry, shareholder register);
- tax domicile and other tax-related documents and information, including the FATCA and/or CRS status; and
- transactions, assets and orders and communications relating thereto, identification data – including the Shareholder and/or the related Individual’s name, address, national identifiers, date and country of birth, etc. – account information, contractual and other documentation and transaction information)

(together referred to as the “**Confidential Information**”) to the Sub-contractors.

Please note that countries which are not part of the EU, may not ensure an adequate level of protection of personal data as assessed by the EU Commission. To mitigate this risk and ensure a comparative level of protection, Northern Trust has put in place standard data protection clauses adopted by the EU Commission with its processors and approved third party sub-contractors located outside the EEA. This is in accordance with the agreements the Fund has in place with Northern Trust.

Except as required or permitted by law or the agreements in place, (i) the Sub-contractors are not permitted to share the Confidential Information with non-affiliated entities of Northern Trust and (ii) Northern Trust will take all reasonable steps to ensure the Sub-contractors treat such disclosed information as confidential.

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2. Investor support service

We would also like to inform you that Northern Trust, will expand its investor support service. The extended service will be available during Asian working hours (from 9:00am – 6:00pm (HKT)) and will provide support in English, Mandarin, Cantonese and Japanese.

The service will cover all investor support queries and will operate via the same contact details as the main investor support team:

Email: FUNDSMITH-TA-LUX@ntrs.com,

Telephone: **+352 28 294 136**

To support this service Northern Trust will outsource the above aspect of its transfer agency activity to its affiliates Northern Trust Company Hong Kong (NTCHK) and Northern Trust Company Singapore Branch (NTCS). Thus, Northern Trust may transfer data (including investor personal data) to other entities of its group specialised in the operational tasks concerned so they can process relevant personal data, as further described in section 1 above.

Northern Trust has received approval from the Luxembourg regulator, the *Commission de Surveillance du Secteur Financier* to outsource these activities. The expected timeline for the commencement of these activities is December 1, 2022.

Should you require further information, please do not hesitate to contact Northern Trust Transfer Agency Investor Services via email FUNDSMITH-TA-LUX@ntrs.com or call **+352 28 294 136** from Monday to Friday from 9:00am – 6:00pm (CET).

Yours sincerely,

Northern Trust Global Services SE
For and on behalf of Fundsmith SICAV
As Administrator to the Fund