

VONTOBEL FUND

Investment company with variable capital
11-13, Boulevard de la Foire, L-1528 Luxembourg
RCS Luxembourg B38170
(the "Fund")

Luxembourg, 29 November 2022

NOTIFICATION TO SHAREHOLDERS

The board of directors of the Fund (the "Board of Directors") wishes to inform you of the following changes to the Fund's current Sales Prospectus dated January 2022 (the "Sales Prospectus"):

1. Amendment of the investment policy of the sub-fund Vontobel Fund - Vescore Artificial Intelligence Multi Asset (the "Sub-Fund")

The Sub-Fund will promote environmental and/or social characteristics in accordance with Article 8 SFDR and will not have as its objective a sustainable investment.

The Sub-Fund will promote environmental and/or social characteristics by investing its direct securities holdings in accordance with sustainability criteria set by the Investment Manager including an investment of at least 5% in sustainable investments that are green, social and sustainable bonds which comply with internationally recognized standards such as the International Capital Market Association (ICMA).

The Sub-Fund's investment policy will be further detailed and include the following instruments that the Sub-Fund may also be exposed to:

- Depositary receipts, such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs),
- Real estate equities and investment trusts, and
- may also hold bank deposits for liquidity management.

2. Renaming of the sub-fund Vontobel Fund - TwentyFour Monument European Asset Backed Securities (the "Sub-Fund") and changes to its investment policy

The Sub-Fund's name shall be changed to Vontobel Fund - TwentyFour Sustainable Monument European Asset Backed Securities.

The Sub-Fund's description of the investment universe in the investment policy will be amended as follows:

| Previous wording | New wording |
|--|--|
| While respecting the principle of risk diversification, the Sub-Fund's assets are essentially exposed to the fixed in-come | The Sub-Fund will invest at least 70% of its net assets in asset backed securities (ABS) which includes mortgage backed securities |

| | |
|---|--|
| <p>asset class, in particular to its asset-backed securities ("ABS") sectors.</p> <p>The exposure can be built up, inter alia, by purchasing ABS, including mortgage-backed securities ("MBS") and Collateralized Loan Obligations ("CLO"), issued by entities domiciled in Europe (incl. the United Kingdom), rated at least BBB- (or equivalent) at the time of investment by one or more of Standard & Poor's, Moody's Investor Services and Fitch. The securities will be backed by the assets of institutions and issuers such as, but not limited to, residential mortgages, commercial mortgages, automobile leases and loans, small and medium enterprises (SME) loans and other secured bonds.</p> | <p>(MBS) and collateralised loan obligations (CLOs) issued by entities domiciled in Europe (including the United Kingdom) and Australia subject to a maximum upper allocation of 20% to Australia domiciled issuers. The ABS securities will be rated at least BBB- (or equivalent) at the time of investment by one or more of S&P, Moody's and Fitch. The securities will be backed by the assets of institutions and issuers such as, but not limited to, residential mortgages, commercial mortgages, automobile leases and loans, small and medium enterprises (SME) loans and other secured bonds.</p> |
| | <p>The Sub-Fund will not actively invest in distressed securities. In the event a security is downgraded and becomes distressed (i.e. securities that are typically rated with a S&P rating below CCC- (or an equivalent rating from another rating agency)), the Sub-Fund may continue to hold the security subject to the overall exposure to distressed securities not exceeding 5% of the Sub-Fund's net assets.</p> |
| | <p>Up to 30% of the Sub-Fund's net assets may be invested in other securities, other instruments, other asset classes, countries, regions, money market instruments and bank deposits to achieve the investment objective and/or for liquidity management.</p> |
| <p>The Sub-Fund may not use other collective investment schemes for the purpose of building up its exposure to the aforementioned investment universe.</p> | <p><i>(unchanged)</i></p> |
| <p>The Sub-Fund may hold liquid assets on an ancillary basis.</p> | <p>The Sub-Fund may hold up to 20% of its net assets in bank deposits at sight. In exceptionally unfavourable market conditions, the Sub-Fund may hold up to 100% of its net assets in money market instruments and hold bank deposits at sight.</p> |
| <p>The exposure to the above asset class may be also established indirectly via derivatives, including but not limited to credit derivatives. The derivative may be traded on an exchange or over-the-counter.</p> | <p>Sub-Fund investments will be achieved directly through the purchase of securities or indirectly through financial derivative instruments. The Sub-Fund may use financial derivative instruments, traded on an exchange or over the counter, for efficient</p> |

| | |
|--|---|
| The derivatives may also be used for hedging purposes. | portfolio management (including hedging) and also for investment purposes in order to indirectly establish exposure to the above asset classes. Such financial derivative instruments shall include, but are not limited to forwards, futures, options (including currency options), and swaps (including but not limited to interest rate swaps, currency swaps and credit default swaps). |
|--|---|

3. Changes to the investment policies of Vontobel Fund - TwentyFour Strategic Income Fund and Vontobel Fund - TwentyFour Absolute Return Credit Fund (the “Sub-Funds”)

The Sub-Funds investment policies will be further detailed as follows:

The Sub-Funds may invest in money market instruments and bank deposits for liquidity management.

The sub-funds will not invest in Russia.

Also, the potential investment universe of the sub-fund Vontobel Fund - Strategic Income Fund has been clarified that the Sub-Fund may also invest in securities from emerging markets and in high yield securities. This Sub-Fund further will not actively invest in distressed securities. In the event that a security in the Sub-Fund is down-graded and becomes distressed (i.e. securities that are typically rated with a S&P rating below CCC- (or an equivalent rating from another rating agency) the Sub-Fund may continue to hold the security subject to the overall investments to distressed securities may not exceed 5% of the Sub-Fund’s net assets.

4. Changes to the investment policies of the sub-funds Vontobel Fund - Swiss Money, Vontobel Fund - Euro Short Term Bond, Vontobel Fund - US Dollar Money, Vontobel Fund - Sustainable Swiss Franc Bond, Vontobel Fund - Green Bond and Vontobel Fund - Global High Yield Bond (the “Sub-Funds”)

The Sub-Funds investment policies will be further detailed by including that they may invest in money market instruments and bank deposits for liquidity management as well as in the following instruments as detailed in the table below:

| Name of Sub-Fund | Convertible and warrants bonds in % of a sub-fund’s net assets | High yield bonds |
|--|---|-------------------------|
| Vontobel Fund - Swiss Money | up to 25% | up to 10% |
| Vontobel Fund - Euro Short Term Bond | up to 20% | up to 20% |
| Vontobel Fund - US Dollar Money | up to 20% | |
| Vontobel Fund - Sustainable Swiss Franc Bond | up to 7% (this limit remains unchanged) | up to 10% |
| Vontobel Fund - Green Bond | up to 20% | up to 15% |
| | | |

In addition, the investment policy has been amended of the Sub-Fund Vontobel Fund - Sustainable Swiss Franc Bond in order to reflect that at least 90% of the securities of the portfolio of the Sub-Fund are covered by the ESG analysis.

Also, the investment policy of Vontobel Fund - Global High Yield Bond has been further detailed by including that the Sub-Fund may invest in hard currency securities of issuers in emerging markets.

The investment policy of Vontobel Fund -- Green Bond will be amended by including that the Sub-Fund will at least invest 80% (previously: 75%) of the its net assets in various bonds and similar fixed and variable interest rate debt instruments classified as "Green Bonds" and up to 20 (previously: 25%) of the Sub-Fund's net assets may be invested outside the aforementioned Green Bond investment universe.

5. Appointment of Vontobel Asset Management Inc. as Sub-Investment Manager for the Sub-Funds

**Vontobel Fund - Global High Yield Bond,
Vontobel Fund - Sustainable Emerging Markets Debt,
Vontobel Fund - Emerging Markets Corporate Bond,
Vontobel Fund - Emerging Markets Blend and
Vontobel Fund - Emerging Markets Investment Grade (the "Sub-Funds")**

Vontobel Asset Management AG, the Investment Manager of the Sub-Funds, has appointed Vontobel Asset Management Inc. as Sub-Investment for the Sub-Funds Vontobel Fund - Global High Yield Bond, Vontobel Fund - Sustainable Emerging Markets Debt, Vontobel Fund - Emerging Markets Corporate Bond, Vontobel Fund - Emerging Markets Blend and Vontobel Fund - Emerging Markets Investment Grade.

6. Changes to the investment policies of the sub-funds

**Vontobel Fund - Bond Global Aggregate,
Vontobel Fund - Value Bond,
Vontobel Fund - Absolute Return Bond (EUR) and
Vontobel Fund - Credit Opportunities (the "Sub-Funds")**

The Sub-Funds investment policies will be further detailed by including the following instruments:

The Sub-Fund's may have exposure to money market instruments and bank deposits for liquidity management.

The Sub-Funds may further enter into one or more total return swaps referring to underlying such as bonds (including convertible bonds), credit indices and money market instruments.

The Sub-Funds exposure to total return swap expressed as the sum of notional is expected to range between 0% and 400% of the net assets of the Sub-Fund. In cases where this range is exceeded, exposures should remain below 450%.

The exposure of the sub-fund Vontobel Fund - Credit Opportunities to total return swaps expressed as the sum of notional is expected to range between 0% and maximum 500% of the net assets of the Sub-Fund.

It has also been clarified in the Sub-Funds' investment policies (except for Vontobel Fund - Bond Global Aggregate, which already has such clarification) that the Sub-Funds may invest up to 40% of their net assets in securities of issuers that are domiciled in, have their main business activity in or are mainly exposed to non-OECD countries.

**7. Changes to the investment policy of the sub-fund
Vontobel Fund - Sustainable European Small Cap Equity (the "Sub-Fund")**

The Sub-Fund's investment policy will be further detailed by including the following instruments in which the Sub-Fund may invest:

- real estate equities and closed-ended real estate investment trusts;
- securities from new issues within the limitation of section 9.1 (d) of the General Part of the Sales Prospectus,
- money market instruments and bank deposits for liquidity management.

8. Changes to the investment policy of the sub-fund Vontobel Fund - Swiss Mid and Small Cap Equity (the "Sub-Fund")

The Sub-Fund's investment policy will be further detailed by including the following instruments in which the Sub-Fund may invest:

- real estate equities and closed-ended real estate investment trusts and
- money market instruments and bank deposits for liquidity management.

**9. Changes to the investment policy of the Sub-Funds
Vontobel Fund - European Equity,
Vontobel Fund - US Equity,
Vontobel Fund - Global Equity,
Vontobel Fund - Global Equity Income,
Vontobel Fund - Emerging Markets Equity and
Vontobel Fund - Asia ex Japan (the "Sub-Funds")**

The Sub-Funds investment policies will be further detailed by including the following instruments in which the Sub-Funds may invest:

- real estate equities and closed-ended real estate investment trusts;
- depositary receipts such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs);
- securities from new issues within the limitation of section 9.1 (d) of the General Part of the Sales Prospectus;
- money market instruments and bank deposits to achieve the investment objective and/or for liquidity management.

In addition, the Sub-Fund Vontobel Fund - Global Equity may invest up to 35% of its net assets via Shanghai-Hong Kong Stock Connect and Shenzhen-Hong Kong Stock Connect in China A-Shares.

**10. Changes to the settlement cycle of the sub-fund
Vontobel Fund - Emerging Markets Equity (the “Sub-Fund”)**

The payment of the issue price must be received by the Depositary of the Sub-Fund within three Business Days (previously: four Business Days) following the Subscription Day. This provision shall apply accordingly to redemption and conversion applications.

11. Changes to the investment policy of the sub-fund Vontobel Fund - Clean Technology (the “Sub-Fund”)

The Sub-Fund's investment policy will be further detailed by including the following instruments in which the Sub-Funds may invest:

- Real estate equities and closed-ended real estate investment trusts,
- depositary receipts, such as such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs)
- securities from new issues within the limitation of section 9.1 (d) of the General Part of the Sales Prospectus, and,
- bank deposits for liquidity management.

The scope of applicable exclusions of companies will be described in more detail by excluding companies that produce controversial weapons and issuers that have a meaningful percentage of their power generation capacity in nuclear and coal. In addition, the Sub-Fund excludes issuers that derive more than a minimal percentage of revenues from the following activities: mining of uranium and coal extraction, the production of alcohol and tobacco, the involvement in gambling, pornography and fur.

12. Changes to the investment policy of the sub-fund Vontobel Fund - Energy Revolution (the “Sub-Fund”)

The Sub-Fund's investment policy will be further detailed by including the following instruments in which the Sub-Funds may invest:

- Real estate equities and closed-ended real estate investment trusts,
- depositary receipts, such as such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs)
- securities from new issues within the limitation of section 9.1 (d) of the General Part of the Sales Prospectus, and,
- bank deposits and money market instruments for liquidity management.

The main characteristics of the Sub-Fund's target investments will be re-described as follows:

The Sub-Fund invests worldwide in the theme of the ongoing transition from carbon to renewable energy, mainly via equities of companies - along the entire supply chain, from basic resources to technology enablers, which offer long-term growth potential thanks to their considerable exposure to the mentioned theme, while alternative energy, hydrogen, fuel cells, and batteries plus related materials are in focus.

13. Changes to the investment policy of the sub-funds
Vontobel Fund - mtX Sustainable Asian Leaders (ex Japan) and
Vontobel Fund - mtX Sustainable Emerging Markets Leaders (the “Sub-Funds”)

The Sub-Fund's investment policy will be further detailed by including the following instruments in which the Sub-Funds may invest:

- Real estate equities and closed-ended real estate investment trusts,
- depositary receipts, such as such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs)
- securities from new issues within the limitation of section 9.1 (d) of the General Part of the Sales Prospectus, and,
- money market instruments and bank deposits to achieve the investment objective and/or for liquidity management.

14. Changes to the investment policy of the sub-fund
Vontobel Fund - Smart Data Equity (the “Sub-Fund”)

The Sub-Fund's investment policy will be further detailed by including the following instruments:

- Real estate equities, closed-ended real estate investment trusts and real estate investment companies up to 10% of the Sub-Fund's net assets;
- depositary receipts, such as such as American Depositary Receipts (ADRs), Global Depositary Receipts (GDRs) and European Depositary Receipts (EDRs)
- money market instruments and bank deposits to achieve the investment objective and/or for liquidity management.

15. Changes to the investment policies of the sub-funds
Vontobel Fund - Emerging Markets Debt,
Vontobel Fund - Sustainable Emerging Markets Debt,
Vontobel Fund - Emerging Markets Investment Grade,
Vontobel Fund - Emerging Markets Corporate Bond,
Vontobel Fund - Emerging Markets Blend and
Vontobel Fund - Sustainable Emerging Markets Local Currency Bond (the “Sub-Funds”)

The Sub-Funds may enter into one or more total return swaps to gain or hedge exposure to the Sub-Funds' permitted asset and liquidity management.

Types of underlying to the total return swaps may include, but are not limited to, bonds (including convertible bonds) and money market instruments.

| Name of Sub-Fund | Expected range of exposure to TRS expressed as the sum of notional in % of the net assets in % of a sub-fund's net assets | Maximum exposure as the sum of notional in % of the net assets |
|-----------------------|--|--|
| Emerging Markets Debt | 0% to 10% | 15% |

| | | | |
|--------------------------------------|----------------------|-----------|-----|
| Sustainable Markets Debt | Emerging | 0% to 10% | 15% |
| Emerging Investment Grade | Markets | 0% to 10% | 15% |
| Emerging Markets Corporate Bond | | 0% to 10% | 15% |
| Emerging Markets Blend | | 0% to 15% | 20% |
| Sustainable Markets Local Bond | Emerging Currency | 0% to 15% | 20% |

The investment policy of the sub-fund Vontobel Fund – Sustainable Emerging Markets Local Currency Bond will be further detailed by including the following instruments in which the Sub-Fund may invest:

- bank deposits for liquidity management;
- volatility options, futures and swaps.

The investment policies of the sub-funds Vontobel Fund - Emerging Markets Debt, Vontobel Fund - Emerging Markets Corporate Bond and Vontobel Fund - Emerging Markets Blend will be further detailed by including that up to 33% of the Sub-Fund's net assets may be invested in other asset classes, other countries and regions and other instruments such as other securities including equities (including real estate investment trusts), money market instruments and bank deposits to achieve the investment objective and/or for liquidity management, outside of the Sub-Fund's investment universe.

The Sub-Fund Vontobel Fund - Emerging Markets Debt may further invest up to 75% of its net assets in the non-investment grade (high yield) sector of the fixed-income asset class.

16. Changes to the investment policy of the sub-fund Vontobel Fund - Sustainable Global Bond (the “Sub-Fund”)

The Sub-Fund's investment policy will be amended in order to permit the investment of up to 15% of its net assets into securities traded on the China Interbank Bond Market via Bond Connect.

17. Changes to the investment policy of the sub-fund Vontobel Fund - Multi Asset Solution (the “Sub-Fund”)

The Sub-Fund's investment policy will be further detailed by including the following indications:

- depositary receipts, such as such as American Depositary Receipts (ADRs) and Global Depositary Receipts (GDRs);
- participation certificates including P-notes;
- up to 40% of the Sub-Fund's net assets may be exposed to securities issued by issuers that are domiciled in, have their main business activity in or are mainly exposed to non-OECD countries;
- up to 30% of the Sub-Fund's net assets may be exposed to high yield securities.

18. Amendments to investment restrictions applicable to various sub-funds

a) Specification of asset divestment from a sub-fund

The following stipulation will be included in section 9.4 (d) of the Sales Prospectus and applies to all sub-funds of the Fund:

The Investment Manager of a Sub-Fund usually divests from an asset that does not comply anymore with applicable sanctions, minimum credit ratings, certain exclusion and/or sustainability criteria as described in a Sub-Fund's investment policy (or annex with regards to "Environmental and/or social characteristics" or "Sustainable Investment objective") within a time period to be determined by the Investment Manager without exceeding in principle three months after such breach was detected, considering prevailing market conditions, the legal and regulatory framework applicable to the relevant asset (e.g. in relation to sanctions) and taking due account of the best interests of the shareholders to the extent possible and in view of the legal context. The Board of Directors or the Management Company may decide to further postpone the rectification of such a breach or decide to carry out the divestment in several instalments over a longer period of time in exceptional cases, provided this is considered to be in the best interests of the shareholders.

b) Determination of a Large Redemption

The Board of Directors may resolve in the interests of investors, if redemption applications received on any Redemption Day for the Sub-Funds

- Swiss Money
- Euro Short Term Bond
- US Dollar Money
- Sustainable Swiss Franc Bond
- Green Bond
- Bond Global Aggregate
- Value Bond
- Absolute Return Bond (EUR)
- Sustainable Emerging Markets Local Currency Bond
- European Equity
- US Equity
- Global Equity
- Global Equity Income
- Emerging Markets Equity
- Asia ex Japan
- Clean Technology
- Energy Revolution
- Smart Data Equity
- Credit Opportunities
- Sustainable Global Bond

- TwentyFour Absolute Return Credit Fund
- TwentyFour Sustainable Short Term Bond Income
- TwentyFour Strategic Income Fund
- TwentyFour Monument European Asset Backed Securities
- Multi Asset Solution
- Multi Asset Defensive
- Vescore Artificial Intelligence Multi Asset

amount to more than 10% (previously: 5%) of its respective net assets, to defer the execution of the redemption applications and to settle them over two or several Business Days on a pro rata basis ("gates"), so that no more than 10% (previously: 5%) of the net assets of the relevant Sub-Fund is affected on any single Business Day.

19. Miscellaneous

The new version of the Sales Prospectus contains various additional updates and clarifications including an update of the composition of the board of conducting officers of the Management Company of the Fund.

The changes described above in the sections 1 to 18 shall be effective as of 2 January 2023.

Investors affected by the changes specified in the sections in the sections 1 to 18 here above who do not agree with the changes described in the relevant section may redeem their shares free of charge by the relevant cut-off time on 29 or 30 December 2022 (as applicable for the relevant Sub-Fund) via the Fund's administrator, distributors and other offices authorized to accept redemption applications.

Investors should consult their own legal, financial and/or tax advisors if they have any questions regarding the changes described in this notice.

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

The Board of Directors